Intermodal Logistics Centre at Enfield

Preferred Project Report

June 2006

SKM

SYDNEY PORTS
FIRST PORT, FUTURE PORT

Intermodal Logistics Centre at Enfield

PREFERRED PROJECT REPORT

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1. Introduction

1.1 Applicant

Sydney Ports Corporation (Sydney Ports) is the applicant for the proposed Intermodal Logistics Centre (ILC) at Enfield.

1.2 Background to the Project

Container trade at Port Botany has been growing at an average rate of about 7.4% per year and is forecast to grow by about 5% per year over the next 20 years, reaching over 3 million TEU[1] per year by 2025. Currently, trucks move over 75% of containers to and from Port Botany and, as the volume of containers grows, it will be necessary to increase the use of rail to moderate growth in truck traffic and assist in the efficient transfer of containers to and from the port.

To date, rail has been an under-utilised resource for transporting freight. Both the Federal and State Governments have recognised the economic, environmental and social advantages of using rail and are endeavouring to promote the increased usage of rail for transporting freight. This has been recently reinforced in the first stage of the NSW Government's Port Freight Plan which aims to increase the proportion of containers transported to and from Port Botany by rail to 40% by 2011.

The future development of intermodal facilities in the Sydney Metropolitan Area has been identified as being vital to improving the efficiency of land transport and supporting efficient port operations in Sydney. Intermodal terminals will facilitate greater use of rail transport and provide for the efficient distribution of containers to and from Port Botany, thus ensuring that Port Botany remains competitive and that trade, and therefore economic growth in NSW, is not inhibited.

One of the key elements of Sydney Ports' strategy to facilitate rail for transporting freight is the establishment, at the former Enfield Marshalling Yards, of an Intermodal Logistics Centre linked by dedicated freight rail access to Port Botany. This development will contribute to the existing and future network of intermodal facilities to enable Sydney to provide an efficient and reliable freight transport system in the future.

Sydney Ports considered the former Enfield Marshalling Yards as a suitable site for the construction of an intermodal terminal and, following the construction of the new marshalling yards, purchased the remaining site progressively between 2001 and 2003. The establishment of an Intermodal Terminal at this location was part of Sydney Ports' strategy for responding to the predicted growth in container trade at Port Botany.

An EIS for a 500,000 TEU intermodal terminal on the Sydney Ports' land was commenced in late 2001, with a Planning Focus Meeting held in September 2001 and Director-General's Requirements issued by the (then) Department of Urban Affairs and Planning (DUAP) in October 2001.

[1] One TEU is equivalent to one twenty-foot container. A forty-foot container is equivalent to two TEU.

Preparation of the EIS was suspended in March 2002 when it was announced that the proposed intermodal terminal would be subject to an independent review by the Hon Milton Morris AO. Conclusions and recommendations from this review were released in February 2003 and included the following:

- The proposed 500,000 TEU intermodal terminal was too large for the site; and
- The NSW Government should conduct a major reassessment of intermodal demand and potential sites. This work should see the development of intermodal sites across Sydney within the next decade as its primary consideration.

Since the outcomes of the independent Milton Morris (2003) review, the NSW Government has continued to reinforce the need to move more freight by rail. As a result, Sydney Ports has revised its Intermodal Terminal proposal. It now proposes a more integrated site development, consistent with the Port Freight Plan and the recently released Freight Infrastructure Advisory Board (FIAB) Report, based around a smaller intermodal terminal linked to on-site empty container storage facilities and port related warehousing, more commonly referred to as an Intermodal Logistics Centre (ILC).

1.3 Preferred Project Report

An Environmental Assessment (EA) report was prepared for the proposed ILC to meet the requirements of the *Environmental Planning and Assessment Act, 1979* (EP&A Act) and the *Environmental Planning and Assessment Regulation, 2000* (EP&A Regulation).

Pursuant to the EP&A Regulation, the EA was lodged with the Department of Planning (DoP) on 14 December 2005 (Application No 05_0147) and was placed on public exhibition by DoP on 9 January 2006.

Following exhibition of the EA, copies of all submissions were provided to Sydney Ports and relevant Government authorities. Sydney Ports has reviewed the submissions and this report (the Preferred Project Report) considers and responds to issues raised, including the need or otherwise to modify the proposal.

1.4 Assessment of Proposal

DoP will prepare an assessment report on the proposed ILC at Enfield which will take into account comments from the relevant Government authorities and the Preferred Project Report provided by Sydney Ports. The assessment report will be provided to the Minister for Planning, who will make a decision on approval and conditions in accordance with the EP&A Act.

On 15 February 2006 the Minister for Planning directed that an independent panel of experts be established into the proposed Intermodal Logistics Centre at Enfield. The Minister specified terms of reference for the Panel and directed the Panel to conduct meetings and make such other enquiries as are necessary in relation to the relevant aspects of the project stipulated in the Panel's terms of reference. A copy of the Preferred Project Report will be provided to the Panel for its consideration.

2. Project Description

2.1 Project as described in Environmental Assessment Report

The proposed Intermodal Logistics Centre at Enfield would be used for the transfer and storage of container freight to and from Port Botany, packing and unpacking of containers within the proposed warehouses and storage of empty containers for later re-use or for return to the Port. These elements were described in detail in Chapter 4 – Project Description of the EA (November 2005). In brief, the ILC at Enfield comprises:

- An Intermodal Terminal for the loading and unloading of containers between road and rail and short term storage of containers;
- Warehousing for the packing and unpacking of containers and short-term storage of cargo;
- Empty Container Storage Facilities for the storage of empty containers for later packing or transfer by rail;
- A Light Industrial and Commercial Area for light industrial and/or commercial use, preferably complementary to operations at the ILC. The area would also act as an interface to adjacent uses along Cosgrove Road;
- A Community and Ecological Area to provide the opportunity to incorporate ecological enhancement and community opportunities. The area would also serve as a buffer between operations on the site and residences to the south of the site; and
- Off site works comprising construction of a road bridge over the existing new Enfield Marshalling Yards for access to Wentworth Street, works on Cosgrove Road to manage access/egress of vehicles to/from the site, and rail connections to the freight rail network.

2.2 Modifications to the Proposal

Having reviewed submissions from the community, local government and State government agencies, and considered the proposal in the light of those submissions, Sydney Ports intends to construct and operate the proposed ILC, as outlined in Chapter 4 of the Environmental Assessment, with the following changes:

- The intersection at Norfolk Road /Roberts Road will be upgraded to RTA design requirements;
- Traffic control measures will be provided to manage articulated or B Double truck traffic leaving the ILC via the Cosgrove Road exit during am/pm peak periods;
- Extra noise barriers (a fence structure approx 350m long and 2m high, comprising double sided metal cladding) on top of the eastern noise mound will be provided along the Cosgrove Road alignment behind the Light Industrial / Commercial Area.

Reference has been made to the provision and operation of a public address system on the site. This system will now not be used at night (10pm to 6am).

3. Responses to Environmental Assessment Report

3.1 Submissions Received

The total number of submissions received and registered by the Department of Planning (DoP) was 329. These submissions were passed to Sydney Ports for its review and as input to the Preferred Project Report.

Submissions have been categorised by Sydney Ports as follows:

- Community (these are summarised in Appendix A)
  - Submissions from individuals or organisations 108 submissions
  - Form Letter Submissions
    - Submissions form letter 1 46 submissions
    - Submissions form letter 2 4 submissions
    - Submissions form letter 3 3 submissions
    - Submissions form letter 4 3 submissions
    - Submissions form letter 5 126 submissions
  - Petitions (4)
    - The Residents of Hankins Court, Chullora (12 signatures);
    - The Residents of Boronia Rd Greenacre (52 signatures);
    - The Proprietors of Strata Plan 14198 Barremma Rd Lakemba (11 signatures);
    - On behalf of the residents of Railway Rd and Unwins Bridge Rd, Sydenham (23 signatures).

- Councils (summarised in Appendix B)
  - Marrickville City Council;
  - Canterbury City Council;
  - Bankstown City Council – two submissions received;
  - Strathfield Council – two submissions received (the second was a separate Council submission to the FIAB report). There were also submissions from The Mayor and two Councillors. These are registered under individual submissions, not those of Council.

- NSW Government agencies/departments (summarised in Appendix C)
  - Department of Environment and Conservation
  - NSW Health
  - Ministry of Transport (2 submissions)
  - NSW Heritage Office

- RailCorp
- Department of Natural Resources
- Roads and Traffic Authority (3 letters).

- Industry (summarised in Appendix D)
  - CBFCA Australia
  - Shipping Australia Limited
  - CFCL Australia P/L
  - Weston Cereal Industries
  - MIST
  - State Chamber of Commerce
  - Walker Corporation
  - Infrastructure Partnerships Australia
  - NSW Road Transport Association Inc
  - Property Council of Australia.

3.2 Assessment of Submissions

Submissions were assessed as follows:

- Submissions were registered by DoP and passed to Sydney Ports;
- Details of each submission were entered into a data base;
- Issues were reviewed for the sufficiency of the EA information and whether additional information was needed for clarification;
- Each question or category of question was answered in the data base;
- Any new work required to answer the question was undertaken; and
- Responses were collated for input to this PPR.

3.3 Issues raised in Submissions

All submissions were reviewed and issues raised in each were placed in Issue Categories. The Issue Categories were derived during the consultation process and attempted to reflect the main areas of interest or concern to community members. It should be noted that inevitably there is some overlap of issues in different categories. Table 3-1 summarises the Issue Categories and the number of submissions that raise that Issue Category.

Table 3-1: Summary of Issues Raised

Issue Category Raised	Number of times raised	Details of Issues
Air Quality	48	Construction dust Effects of increased road traffic Locomotive emissions
Alternative uses of site	1	
Alternative sites	151	Locate ILC elsewhere
Amenity, quality of life	175	Noise Traffic Sleep disturbance
Approval processes	2	Rail access Road access to site
Consultation process	198	Lack of consultation No information for people of NESB Limited time for making submissions
Community and ecological area	6	Access Management
Contamination	9	Remediation Health risk Stockpiles and contaminated dust
Design	3	Site layout
Drainage	1	Flood mitigation
Economic benefit	5	Benefits to industry
EIS process	2	Comprehensiveness of EA
ESD	8	Sustainable development
Flora and Fauna	11	Green and Golden Bell Frog
Government policy	5	Supports Policy
Heritage and archaeology	5	Preservation and management of railway heritage items
Hydrology	6	Drainage, rehabilitate Coxs Creek
Industry opportunities	1	Suggestion for industrial use
Justification of Project	138	No need for intermodal Better located elsewhere
Land use	18	Surrounding land uses, especially residential
Management	7	Suggestions for operations, environmental management, monitoring
Noise	129	Construction noise including reversing alarms Operational noise, especially at night Road traffic noise Rail noise
Planning	4	Zoning Section 94 contributions
Pollution	82	Noise Air Quality Light spill

Property Impacts	147	Loss of land value
Rail Issues	66	Noise Air quality Increased freight movement
Reject Proposal	134	
Safety	25	Storage of hazardous goods Pedestrians Proximity of schools Access for emergency vehicles
Site operations	4	24 hour operation
Site qualities	11	Site access to rail freight line Proximity to residential areas
Socio-economic issues	157	General amenity Noise, Visual, Air, Public Health
Support Proposal	14	
Tarpaulin factory	5	Heritage values of objects on site Reuse opportunities
Traffic	224	Adequacy of modelling and traffic numbers Trucks in residential streets Congestion of road network Intersection performance Public transport Traffic noise Air quality on roads Road condition and maintenance
Vibration	52	Trains on freight line Trucks in the streets

3.4 Key issues

As noted in Table 3-1, the key issues raised by submissions were:

- Project justification (need for the project) and consideration of alternative locations for the proposal;
- Alternative uses for the site, including industrial opportunities and site qualities;
- Traffic issues, primarily intersection performance and network capacity. Other issues raised under traffic relate to the potential impacts from increased traffic, especially trucks and include noise, safety, air quality and general amenity. These are discussed in separate sections below;
- Noise derived from construction works and site operation (especially at night), as well as road traffic noise due to truck movements. Noise from rail movements is addressed in Rail Operational Issues;
- Air quality derived from construction works (dust) and increased truck movements in local streets. Air quality from rail movements is discussed in Rail Operations;
- Rail operational issues, relating to the performance of freight on the rail network between Port Botany and Enfield. Particular concerns were noise and air quality from the rail movements and the movement of rail throughout the night;
- Pollution. This related primarily to noise and air impacts from traffic. Light spill was identified as being of concern to many. Air and noise are addressed elsewhere, so this section will concentrate on light spill;
- Amenity and quality of life. This is generally related to problems of increased traffic through the streets and associated noise and safety. Sleep disturbance and light spill were also important considerations;
- Property impacts, primarily reduction in house values due to the proposed works;
- Land use, dealing with the proximity of residential land uses to the site;
- Consultation process, mainly relating to a lack of consultation throughout the project, the timing of the exhibition over the summer holidays and the limited time available for submissions to be provided in response to the EA;
- Approvals and EIS process;
- The community and ecological area;
- Flora and fauna and ESD;
- Site soil contamination;
- Site design and management;
- Drainage and Hydrology;
- Heritage and archaeology, including the use of the Tarpaulin Shed;
- Socio-economic issues. Issues associated with amenity were addressed separately. This section deals primarily with economic benefits and employment.

3.4.1 Project Justification (Need and Alternatives)

Issues Summary

Submissions concerned themselves with the role of an ILC at Enfield in the context of the proposed intermodal network (as outlined in the FIAB study) and the NSW Government's policy of putting 40% of Port Botany container freight on rail.

Submissions suggested that the proposed Enfield ILC is not in the centre of the market that it serves, and the reality is that the Enfield site is at the western end of the "neck of a funnel" 18 km long, the market referred to being predominantly to the west of the chosen site. It was suggested it would appear to be far more beneficial to locate an Intermodal Logistics Centre further west, to service the actual centre of the market, thereby utilising rail for a greater proportion of the overall transport task. It was suggested that the proposed site would merely transfer road network access from a point of congestion at Foreshore Road and General Holmes Drive to an alternatively congested part of the road network at Enfield.

In particular, Strathfield Council indicated the following: "Whilst it is understood and accepted that a significant increase in cross-metropolitan rail freight movement is necessary to cater for anticipated growth for the future, it is questionable if Enfield is the most suited location to achieve this. The Operation Terminal should be closer to the containers final destination by rail. Serious consideration should be given to a "Sydney Wide" Intermodal based at Ingleburn that is closer to the documented final destination of all freight. It also has heavy rail facilities and a number of motorway options. This in my opinion would prove to be more cost effective and would provide a quality logistic infrastructure, with long-term expansion for the Sydney Basin."

A number of submissions were concerned with the location of the ILC at the specific site in Enfield. It was argued that Enfield is unsuitable site/location for an intermodal logistics terminal to be built due to its close proximity to residential areas and to the compounding of already existing traffic congestion in the area. It was noted that current access to all freeways and motorways requires heavy vehicles passing residential areas. These include the M4, M5 and the recently opened M7. It was argued that a site location further to the west of Sydney would provide a more direct access to the motorways with minimum disruption.

Response

The need for the project and the choice of the existing site at Enfield were outlined in detail in Chapter 3 of the EA. This was outlined in the context of the need for a network of intermodal terminals servicing Sydney, as specified in the Milton Morris Report into the previous proposal at the site. Enfield is considered to support the development of this network, and is a suitable site for providing a distribution network for container imports and exports whose origin or destination is in the inner and middle western suburbs of Sydney. Chapter 3 of the EA identified that the inner and middle western area of Sydney (in which the proposed ILC is located) receives up to 56% of the incoming container traffic through Port Botany and is the origin for export of over 23% of container traffic destined for Port Botany. This

market comprises about 700,000 to 800,000 TEU per year. The development of the ILC will provide the opportunity for 300,000 TEU to be brought into and out of the area by rail (instead of by truck).

The need for the network of intermodal terminals has since been supported by the release of the Metropolitan Strategy and within it the Transport Strategy for Sydney. The strategy confirms the metropolitan freight strategy for import and export containers and reiterates the Government target of increasing rail's share of these containers movements to 40 percent by 2011. It acknowledges the need for significant upgrading of existing intermodal terminal infrastructure and new, larger scale road/rail intermodal terminals to provide sufficient capacity to allow the rail mode share target to be achieved. It identifies actions undertaken and proposed to achieve this. One such action was the release of the Freight Infrastructure Advisory Board (FIAB) final report - *Railing Port Botany's Containers*- which outlines a number of recommendations to help develop the planning for port freight movements in Sydney. As noted in the EA, the proposed ILC at Enfield is an important component in the FIAB report.

The development of the ILC will provide the opportunity for 300,000 TEU to be brought into and out of the area by rail (instead of by truck). It should be noted that every 50,000 TEU throughput processed through the ILC results in a saving of 41,000 truck movements between Port Botany and Enfield, and a saving of 16,000 truck movements from Port Botany to the final origin/destination within the ILC market area. That is, any reduction in throughput below 300,000 TEU will result in more trucks on the road within the ILC market area.

The site of the ILC at Enfield is the most appropriate site to service the inner and middle western Sydney catchment for the following reasons:

- The site is available and located within an existing operational industrial precinct with excellent access to two main arterial roads;
- The site and its surrounds have a history of and are currently used for road and rail purposes;
- The site is located at a suitable distance from the port, such that the ILC is a competitive alternative to the all truck delivery option between Port Botany and its final destination within the market area;
- The ILC site is located close to the geographical centre of the Sydney Basin (40km radius from Port Botany) where 85% of all containers from the Port are delivered;
- Sydney Ports Corporation has not found any other site that could service the inner and western Sydney market in a better location (serviced by dedicated freight rail and two main arterial roads), for less cost (given the heavy investment in infrastructure required for potential downstream intermodal locations), with a willing proponent and available for development to assist the NSW Government's objective of increasing the proportion of containers moved by rail to 40% by 2011.

As identified in the Metropolitan Strategy and the FIAB report a number of other intermodal terminals are proposed close to the market to reduce trucking distance to and from the terminal to distribution points. The FIAB also indicated that, not withstanding the industrial growth in the west and south west, there is a need for an intermodal facility in the 'central western" Sydney industrial area to meet local and sub-regional requirements, and that the proposed site at Enfield should be developed for that purpose. The ILC at Enfield will be one element in the NSW Government achieving 40% rail mode

share for transport of containers to and from Port Botany by 2011. These other intermodal areas will also need to be developed in the longer term, as identified in the Metropolitan Strategy.

Sites will be developed in the future in the western and south western areas of Sydney and will service the growing areas which will form their catchments. It would be inefficient to transport from Port Botany to those sites by rail (particularly with restricted rail windows outside of commuter peak hours) and then transport back to the inner and middle western catchment area by truck (backloading).

The ILC is located within an area surrounded by industrial development, and it is through these industrial areas that access will be provided between the proposed ILC and the arterial road network. The residential area south of the site and east of Cosgrove Road (opposite the proposed Community and Ecological Area) will not be subject to truck movements from the site.

Over time, and based on the experience of existing intermodals, the traffic impact of the fully operational ILC will decrease as truck fleet owners improve backloading trips between industrial areas, and continue to rationalise the number of trips required to the ILC in the pursuit of reducing fuel costs and improving efficiency. Moreover these benefits will expect to accrue more quickly once the network of intermodals is operational, and backloading is optimised across the Sydney Basin.

Existing and future heavy vehicles, not related to the ILC, will continue to affect residential areas on existing arterial roads, including Roberts Road and the Hume Highway. Motorways can all be accessed from the Enfield ILC via the designated arterial road network, which is the most appropriate route for heavy vehicle traffic. The impacts of trucks generated by the operation of the ILC are discussed in the traffic section below.

3.4.2 Traffic

Issues Summary

Traffic issues raised by the many community submissions were:

- Traffic generation from the site will add to the many traffic problems that already exist – further congestion on an already congested network;
- The traffic will have impacts in residential areas, causing safety, pollution and health effects;
- There will be further problems on specific roads, especially Roberts Road and Boronia Road. The ability of some roads such as Cosgrove Road to deal with increased truck traffic, especially B Doubles, was raised;
- Further congestion on major roads will lead to rat-running, especially for the smaller trucks which are difficult to control and will cause general motorists to divert through residential areas to avoid congested arterial roads; and
- Preferences for alternative access points to the site were raised.

A number of individual submissions addressed traffic issues in numerical terms, through provision of existing data or specific observations.

The Roads and Traffic Authority (RTA) provided 3 separate submissions in response to the EA. The second submission provided recommendations for the Statement of Commitments. The other two were concerned with:

- Traffic growth assumptions used in the EA studies, compared with those expected by the RTA and assumptions regarding back-loading;
- The capacity and operational performance of key intersections – Hume Highway and Cosgrove Road, Roberts Road and Norfolk Road, Roberts Road and Juno Parade and Punchbowl Road and Cosgrove Road;
- The benefits of a one way pair option of Cosgrove Road and Gould Street;
- Results of modelling using "SCATES" compared with the results provided in the EA;
- Local area traffic management issues and requirements;
- The costing of required road works; and
- Compliance with Heavy Vehicle Regulations.

Bankstown and Strathfield Council submissions considered traffic issues and retained the services of traffic consultants to advise them on the traffic assessment undertaken in the EA. Canterbury Council also addressed traffic issues. The issues raised in the Strathfield and Canterbury Council submissions included:

- Local area traffic management and "rat running";
- Intersection analysis and performance, specifically Roberts Road and Norfolk Road and the ability of B Doubles to use that intersection;
- Wentworth Street, including its condition and the requirement for approval for access;
- Alternative entry and exit locations to the site;
- Network modelling and performance and management of operational traffic;
- Management of construction traffic; and
- Parking and access to the site for employees by public transport.

The issues raised in Bankstown Council's submission included:

- Traffic on Boronia Road / Juno Parade;
- Turning movements for trucks, especially B Doubles on Roberts Road at Norfolk Road and Juno Pde, and at Hume Highway and Cosgrove Road;
- The need for the access to be at Cosgrove Road rather than Wentworth Street, with a one way pair including Gould Street;
- Traffic management issues in Bankstown to avoid rat running by trucks and by other vehicles avoiding congestion; and
- Specific criticism of the modelling and analysis undertaken in the EA.

Responses

The issues raised by members of the community are generally addressed in the submissions by the RTA or Councils. A number of submissions raised the issue of the calibration of the traffic model used. The Independent Panel requested that the model be recalibrated to increase acceptance against the calibration criteria used and that the data should be assessed against 2002 screenline counts. This new analysis is provided in Appendix E. The recalibrated models were reviewed and are regarded as suitable for use in the transport assessment of the project. They confirm the level of base network activity and the marginal impacts that the proposed ILC would have on the surrounding traffic.

A summary of the comments provided by RTA and our responses to those comments follow. Detailed responses are provided in Appendix C.

Table 3-2: RTA Issues and Responses

Issues	Responses
In the RTA's view – some of the assumptions in the EA are optimistic. The rate of development growth is not anticipated to be as high as that proposed.	Traffic growth may be greater than local development growth on certain roads due to through traffic, and switching away from congested routes.
Nor is the degree of backloading likely to rise from the current 8% to 30% without significant improvements to goods handling in the industry and / or technological innovation	30% backloading was accepted for use in the Port Botany Expansion EIS. This target is expected to be reached at Enfield due to an increase in multiple vehicle trip cycles, and the multiple and complementary container business types on site.
Over time, the number of B-doubles accessing the site is expected to increase. This may reduce total number of heavy vehicles accessing the site	An increase in B-double use may reduce total traffic generation, although the impact of a smaller number of larger vehicles is likely to be similar to the stated impacts.
The key intersections still have some capacity (with the exception of Punchbowl Road / King Georges Road) but without detailed SCATES modelling it is difficult to determine best operating options for these intersections	We consider that the INTANAL analysis presented is sound for the purposes of evaluating intersection performance. The SKM traffic assessment provided comparable current intersection performance to the RTA assessment.
Provided the appropriate widening and roadworks are carried out, access to the site via Cosgrove Road and Norfolk Road is considered to be less detrimental to traffic flow than if Cosgrove Road remains a two-way road. While the one-way pair option of Cosgrove Road and Gould Street was dismissed earlier in the study, it should be re-examined as it has several benefits. It is thought that a SCATES analysis would show traffic signals operating more efficiently at the 2 intersections with the Hume Highway.	See previous comment
It would also allow retention of on-street parking on Cosgrove Road, something all the industries were adamant about.	Agree that this would be a benefit of the one-way pair option. It should be noted, however, that the current ILC proposal for using Cosgrove Road as a second access does not limit on-street parking.
Modelling Results Using "SCATES"	
The RTA has undertaken detailed modelling of the road network surrounding the Enfield site using SCATES model and has concluded that the SKM traffic analysis was not comprehensive enough to indicate the operational performance of linked intersections along Roberts Road and also along Hume Highway.	SKM did not analyse the linked junctions as it was considered that the junctions could be assessed as stand-alone junctions. The key reason being the distance between the respective intersections. The analysis undertaken by SKM is considered to be robust.

The RTA has investigated a number of options to improve the current and future performance of the following key intersections using its SCATES model. The modelling results show that any additional loading of heavy vehicles on the road network will adversely impact on the operational performance of the above intersections both in the construction phase and by 2016. Even though the number of heavy vehicles are relatively small compared to the total traffic volumes our modelling shows their impacts are significant. Our modelling also shows that the operational performance of the road network will be improved with a one-way pair option using Cosgrove Rd/Gould St.	SKM analysis shows that the development does not have a significant impact on the performance of the intersections. This is documented in the EA. SKM modelled the one-way pair subsequent to the submission of the EA. The intersection of Cosgrove Road / Hume Highway is improved by the one-way pair in the short term.
Cosgrove Rd/Hume Highway We agree with the SKM analysis that this intersection needs upgrading. However, the operational performance of this and other intersections along the Hume Highway would be improved by a one-way pair option by making Cosgrove Rd (south bound) and Gould St (northbound) as a one-way pair. The total cost of works required at this intersection is estimated at about $3m.	In the short term the performance of this intersection will improve. However, wider network issues still need to be taken into consideration.
Sydney Ports Corporation (SPC) claims that this entry/exit point at Cosgrove Rd would only be used by a small number of heavy vehicles to access the Intermodal Logistics Centre (ILC). The RTA is, nevertheless, concerned that additional vehicles from the ILC will impact the intersection. In view of the cost involved in upgrading this intersection it was agreed that SPC would submit, for consideration by the RTA, measures to limit the number of heavy vehicles from using Cosgrove Rd as an entry/exit point. This may obviate the need to upgrade this intersection in the short term.	SPC will submit, for consideration of the RTA, measures to limit the number of B-Doubles leaving from the ILC via Cosgrove Road during AM and PM peak periods.
Roberts Rd/Norfolk Rd This intersection performs adequately now. However, with the ILC in place there would be a need to upgrade this intersection to accommodate 26m B-Double turning movements into/out of Norfolk Rd onto Roberts Rd for both physical turning capacity and safety reasons. The cost of these works is estimated at about $3.6m. SPC have agreed to pay for these works.	SPC is committed to improving the layout of this junction in consultation with the RTA to enable improved access for B Doubles at this point. A breakdown of the costs has not been undertaken. This will be undertaken during detailed design.
Local Area Traffic Management	
The area bordered by Roberts Road, Hume Highway and Juno Parade is predominantly residential, containing a number of schools. For this reason it is important that heavy vehicle movements associated with the ILC be constrained to the major road network and not travel through residential areas when travelling to or from the ILC.	The movement of ILC trucks through the residential area will be restricted and managed through LATM measures to be undertaken in consultation with the RTA and Councils.
A range of traffic management measures will be required in the area to ensure that these movements are deterred, while still allowing access by residents and minimal impact on existing bus routes. While detailed design of these measures has not been undertaken, it is anticipated that up to $1 million will be required.	Costing of LATM measures has not been undertaken. The key measure is the redesign of Roberts Road / Norfolk Road intersection to prevent vehicles from accessing the residential areas. The possible movement of ILC trucks through the residential area will be restricted, and managed through LATM measures to be undertaken in consultation with the RTA and Councils.
Costing of Required Road Works	
The RTA currently does not have any plans or funds available for future widening of the Hume Highway at Cosgrove Rd or at the other intersections mentioned above for the foreseeable future.	Noted.

The ILC will be severely constrained in its operational performance if the intersection improvements are not made during the construction phase of the ILC. Improvements will be required at the key intersections of Roberts Rd/Norfolk Rd as well as at the Hume Highway/Cosgrove Rd intersection if the ILC is to perform adequately.	It is not considered that the ILC will be severely constrained in its operational performance if the improvements are not made during the construction phase of the ILC. However, SPC will undertake to improve the junction of Roberts Road / Norfolk Road at this stage. No improvements are considered at the Hume Highway / Cosgrove Road intersection.
Compliance and Heavy Vehicle Regulations	
The RTA welcomes measures to ensure that heavy vehicles travelling to and from the ILC use appropriate routes and do not travel through residential areas. The RTA is happy to be consulted during the development of Local Area Traffic Management (LATM) measures, particularly in relation to speed zoning, noise reduction and emissions management.	Appropriate LATM measures will be considered to prevent heavy vehicles from the ILC using residential streets to access the arterial road network. 3-tonne load limits are already in place.
The RTA supports the proposal that all traffic is accommodated on-site. The RTA also supports the development of a site traffic management plan to bind all lessees and transport operators to a central objective of developing the ILC site as a model of good practice. The RTA is happy to be consulted during its development.	Noted.

Summaries of the main comments from Strathfield and Canterbury Councils and responses are provided in Table 3-3. Full details are provided in Appendix B.

Table 3-3: Strathfield and Canterbury Council comments on Traffic and Responses

Local area traffic management and rat running	
Smaller freight vehicles would find alternative routes via local streets. Access and egress to / from the site is being directed to intersections already over capacity with current traffic volumes which generally tends to create "Rat-Runs" through residential streets. Local area traffic management measures for Cosgrove Rd and surrounding streets should be further investigated to optimise the access / egress arrangements to the proposed site. Cosgrove Road / Punchbowl Road - The EA identifies the residential land use on the southern end of Cosgrove Road, however, there is no firm proposal of how trucks will be prevented from using this intersection. This issue is particularly important given the fact that the aaSIDRA analysis currently shows the intersection of Cosgrove Road and the Hume Highway as being oversaturated with conditions deteriorating over time. The temptation of users of the Enfield ILC to seek alternative access and egress points from the site would be significant.	Any vehicle above 3 tonne tare and not articulated is identified in the EA as a light truck. The existing traffic management measures in residential streets surrounding the development include extensive use of load limits (to 3 tonnes or less). The existing performance of the intersections is an issue for the RTA and local Councils to alleviate. Enfield ILC contributes only a marginal increase to the volumes of traffic on the road network. Measures will be put in place by SPC to restrict ILC trucks from using residential streets and leaving the ILC site via Cosgrove Rd during AM and PM peak hours. Local area traffic management measures for Cosgrove Road will be considered during detailed design to prevent large vehicles travelling south on Cosgrove Road. No intersection improvements are being considered for the Cosgrove Road / Hume Highway intersection. The use of Cosgrove Road south by trucks will be monitored by SPC and controls implemented to prevent trucks travelling to and from the ILC site from using Cosgrove Rd south. However, heavy vehicles currently use this road to access the industrial land uses along Cosgrove Road. Truck access to the residential area east of Cosgrove Road is limited by the chicane in Madeline Street and Blanche Street being one-way westbound.
Intersection analysis and performance	
Disagrees with the statement that the Roberts Rd / Norfolk Rd intersection is operating with spare capacity at level of service B and requires no enhancement. We suggest that this intersection is already over saturated with current traffic volumes currently at level of service F and requires complete re-construction and re- modelling to include SCATS	Our traffic counts and analysis indicate that the average delay for all vehicles at this intersection is 20 seconds in both the AM and PM peak hours. While the average delay on some movements may be high, the average delay on others would be minimal, resulting in an acceptable overall level of delay. Our analysis is presented in the report which states that the

modifications. Norfolk Rd is approved only for use by 23m B-doubles and Wentworth St is not approved for B-double use. Traffic counts confirm that many of the critical intersections pertinent to this proposal carry significant volumes of traffic outside the hours quoted. Considering these volumes and the documented peak period for truck movements from the ILC is 1430hrs with 103 movements, this in my mind considerably flaws the efficient and effective movement of heavy vehicles both to and from the proposed site. A number of intersections have been omitted which this council deems critical to optimal traffic flow in the area. Council believes that the following intersections are considered critical to traffic operations in the area and have not been assessed by SKM in their proposal. - Hume Highway/Waterloo Road - Liverpool Road/Homebush Road - Arthur Street/Richmond Road The current geometry of the Roberts Rd / Norfolk Road intersection is only suitable for B-Doubles to enter from the south and exit to the north. With the exception of the northbound right turn from Roberts Road into Norfolk Road and the right turn movement from the eastern side of Norfolk Road, all other movements provide inadequate turning paths for B-Doubles. The modelling conducting by SKM indicates that the dominant movement of HGVs to and from the proposed site will be to the north and northwest. The volume of traffic and level of congestion on Roberts Road will inhibit the ability of long vehicles to safely make wide turns in order to enter from or exit to the north. it is recommended that the intersection of Roberts Road and Norfolk Road be completely reconfigured in order to adequately meet the needs of this proposal.	intersections operate at an acceptable level of service. Norfolk Road / Wentworth Street is approved for use by 23m B-doubles between Roberts Road and Metro Smallgoods. It would be appropriate to extend the approval to the ILC entry. Council and the RTA have previously (June 2005) undertaken tests with 25m B-doubles at Roberts Road / Norfolk Road. The testing indicated a problem with the left turn into Norfolk Rd. This turn would be possible with intersection improvements (i.e. a splayed intersection approach – left turn in from Roberts Road). Council indicated no problems with other movements at this intersection with a 25m B-Double. The peak period was analysed in terms of traffic impact of the proposed development. The survey data from the tube counts indicate that this is the peak period which should be considered for overall network performance i.e. analysed worst case analysis, which is consistent with RTA requirements. The intersections analysed were considered to be the most critical to the impact assessment. A meeting was held with the RTA where additional intersections were requested and undertaken. Hume Highway / Waterloo Road was analysed in the studies for the previous proposal in 2001. The LoS at this intersection was A. It was not considered that conditions have significantly changed at this intersection since 2001. Liverpool Road / Homebush Road – this intersection is to the east of the proposed site. The traffic distribution shows that approximately 1 HGV will use this intersection from the site and therefore not considered to be adversely impacted by the ILC – i.e. the market / destination is to the west of the site. Arthur Street / Richmond Road – No vehicles from the ILC are anticipated to use this junction and therefore it has not been considered. Council and the RTA have previously (June 2005) undertaken tests with 25m B-doubles at Roberts Road / Norfolk Road. The testing indicated a problem with the left turn into Norfolk Rd. This turn would be possible with intersection improvements (i.e. a splayed intersection approach – left turn in from Roberts Road). Council indicated no problems with other movements at this intersection with a 25m B-Double. The other two intersections mentioned (Roberts Rd / Juno Pde and Hume Highway / Cosgrove Rd) are already approved to provide appropriate access for 25 m B – doubles. SPC has agreed with the RTA that this intersection will be enhanced to improve traffic flow, including B Double movements, i.e. SPC to consider a left turn slip lane to improve access to the ILC.
Wentworth Street condition and approvals	
Council is the authority for approval for any access to Wentworth St. Council would not normally approve this access, as there are already a number of access points to this site. Council needs to have the ability to approve the proposed bridge alignment in terms of grade and site distance.	An application for access to Wentworth Street will be submitted at the appropriate time. Council will be consulted in the detailed design phase over the access and the bridge design. Based on operational requirements, existing agreements with RailCorp and known on site and off site constraints (including the New Marshalling Yards), the final location of the bridge will most likely not vary more than 20m either side of its current identified landing point. The two points of access as identified in the EA are the optimum locations for the efficient and safe operation of the ILC. That is, there are a number of equally important reasons for the need for two access points, namely to: • meet operational and Occupational Health and Safety

	requirements for two points of access and egress for emergency and evacuation purposes eg. in the event that an accident or spillage results in the closure of one means of access, another must be available to allow the operations to continue. • optimise traffic movements within the internal road system based on the multiple operating sites. • optimise off site traffic movements based on the origin and destination of containers within the area denoted as the ILC market catchment. • provide driver flexibility in the choice of two designated truck routes based on emerging traffic conditions. Eg. accident on Cosgrove Road.
The EA states that Wentworth Street "south of Mayvic Street has deteriorated and the pavement needs rehabilitation in addition to upgrade works (widening). Although a detailed survey has not been conducted as apart of this review, the on-site inspection indicated that the current radii of the intersection Wentworth Street and Norfolk Road are not adequate to cater for long vehicles, in particular B-Doubles. Although a detailed survey has not been conducted as a part of this review, the on-site inspection indicated that the current radii of the intersection Wentworth Street and Norfolk Road are not adequate to cater for long vehicles, in particular B-Doubles.	Wentworth Street is already heavily used by large vehicles, and is approved for use by 23m B-doubles. The surrounding land use is industrial, with many heavy-vehicle generating developments already in place. The use of Wentworth Street by the ILC is consistent with current usage of this road.
Alternative entry and exit	
Insufficient documentation has been made available regarding the investigation of alternative entry / exit points to the proposed site. Consideration should be give to the possibility of linking Gould St to the existing internal road within the site.	Several access points have been considered and thoroughly documented by Sydney Ports Corporation. This was summarised in the EA.
Network modelling and performance, Operational traffic	
The EA concludes that "where the heavy vehicle volume increases, it is generally only by a small margin. In most cases, the change in peak hour traffic volume is negligible." Whilst this is true, the NETANAL model significantly underestimates the current level of congestion on the regional road network and the fact that even a small increase in the number of heavy vehicles will have a major impact on the operation of the regional roads in the area, and the operation of the local roads connecting to them. The assessment area used is too small to enable the evaluation of the network wide implications of this proposal. The EA fails to consider the impact of the recently opened M7 Motorway and the proposed M4 East.	Independent counts were undertaken to calibrate the base model. The model was verified and calibrated – See Appendix C of the full Transport Working Paper (Appendix B) in the EA. The results of the calibration process show that the model used is acceptable for this analysis – and the model updated to reflect existing conditions. The area of impact was discussed with the RTA. The M7 Motorway was included in the model. The proposed M4 East Motorway is not considered as the proposal has not been endorsed by the NSW Government.
Construction traffic	
Construction staff traffic impact. At peak time up to 240 staff will be employed plus 75 construction vehicles daily. The closest train stations are 2.3 km away and the bus service does not adequately service the site. Based on this, it may be safe to assume that private vehicles will be used and therefore parking facilities will need to be considered A traffic management plan (TMP) shall be submitted to and approved by Council for all demolition, excavation and construction activities associated with the development taking place and prior to the issue of a Construction Certificate.	The movement of all 240 staff within the network peak hour is a worst case scenario, and it would be likely that there would be some spreading of arrivals and departures. SPC proposes to cater for all on-site parking. The requirement for parking has been discussed within the EA in Section 3.6.1 of Appendix B. The actual parking arrangements would be addressed as part of the detailed design stage. A Construction Traffic Management Plan would be prepared prior to construction commencement taking into consideration the required demolition, excavation and construction activities.

Parking and public transport	
Public Transport - Given the poor access to public transport for workers at the site and their likelihood of using their own vehicles to travel to and from work, Strathfield Municipal Council requests more detailed proposals of on-site parking provisions for private vehicles.	On-site parking will be provided for all employees. The requirement for parking has been discussed within the EA in Section 3.6.1 of Appendix B. The actual parking arrangements would be addressed as part of the detailed design stage.
Canterbury Council is supportive of denying heavy vehicle access from the southern end of Cosgrove Road (where it meets Punchbowl Road), as this should have the effect of limiting heavy vehicle movements through local streets in Canterbury City to reach the site. Council will however want to be satisfied that the configuration of the southern end of Cosgrove Road is satisfactory to limit heavy vehicle movements, as no details are provided in the Environmental Assessment.	The residential area east of Cosgrove Road has a heavy vehicle limit in place. Cosgrove Road is currently used by some heavy vehicles accessing existing land uses adjacent to the ILC site. Sydney Ports will not be attempting to control movements unrelated to the ILC. Given the market area for the ILC, there should be no need for ILC trucks to use Cosgrove Road south of the site access point. Nevertheless, the movement of vehicles from the Cosgrove Road entrance will be monitored and access / egress controls implemented if required.

Responses to the major issues raised by Bankstown Council are shown in Table 3-4. A more detailed response is provided in Appendix B. In particular, the technical comments provided by Parsons Brinkerhoff are address in the Appendix.

Table 3-4: Response to Bankstown Council

Issues	Responses
Alternative Access Route Council is also concerned that the EA has not seriously considered an alternative access route to and from the site (specifically a paired intersection involving Gould Street and Cosgrove Rd onto the Hume Highway) which we believe could accommodate all traffic entering and leaving the facility, and improve integration with the arterial road network and negate the need for access via Roberts Rd, and as a result would not generate undue traffic impacts to the residents of Greenacre.	SPC has considered alternative access points as part of the previous studies in 2001. A paired intersection has been considered subsequent to the submission of the EA. However, the intersection between Cosgrove Road and Hume Highway still requires upgrading in the future. The junction is unable to accommodate 100% of traffic from the site even with the upgrade in the future.
Only 2 access points are proposed into the site. These are via Cosgrove Rd, from which trucks will gain access to the Hume Highway and thence to Centenary Drive, and secondly, via a bridge to Wentworth Street and thence onto Norfolk Rd and onto Roberts Rd. It should be noted that the traffic modelling shows that almost all the traffic will go in and out via this latter access way. The impact of the additional traffic generated by the proposed terminal was assessed by a model (calibrated by local traffic surveys), which modelled natural traffic growth projections for the area and adding the traffic generated by this development proposal. This assessment was analysed both with and without the proposal going ahead, to compare the effect of background traffic growth with the impact of the development. This analysis indicated that for almost all roads where the traffic counts were made that for peak periods, in both the morning and afternoon, there would be an inappreciable impact on traffic volumes as a result of truck movements generated by this facility.	The distribution in the model minimises the travel time for ILC vehicles. As the majority of destinations are west of Enfield, the Roberts Road access is more popular. The expected split between Norfolk Road and Cosgrove Road is 75%/25%, due to the layout of the site and operations. Enfield ILC contributes to <1% of overall traffic and therefore the impact of Enfield on the local and regional road network is negligible.
Site Access arrangements, and associated impacts on the Local Road Network. The traffic projections included in the EAR indicate that almost all traffic entering or leaving the site will do so via the access	The distribution in the model minimises the travel time for ILC vehicles. As the majority of destinations are west of Enfield, the Roberts Road access is more popular. The expected split between Norfolk Road and Cosgrove Road is 75%/25%, due

onto Roberts Rd. Trucks will turn either north or south along Roberts Rd depending upon their final destination. Only 1 or 2 trucks are shown entering or leaving the facility via the Cosgrove Rd access point and then turning onto the Hume Highway from where they either go east or west along the Hume Highway or north along Centenary Drive. Whilst the assessment has shown that the traffic impacts are minimal in terms of traffic volumes and impacts on intersection capacity, it will remain the case that some 1160 trucks per day will be entering or leaving the site on the roads through Bankstown as a result of the proposed development.	to the layout of the site and operations. In addition, it should be noted that there are some 7000 heavy vehicles (11% of total) currently using Roberts Road each weekday, and about 4600 heavy vehicles (9%) using the Hume Highway. The ILC vehicles will not be concentrated on a single road, allowing any impact to be more easily absorbed.
This is a significant increase, and is likely to be associated with other environmental impacts, including traffic noise and congestion, air pollution, potential disruption to existing land uses, disruption to existing residential character of existing roads in Greenacre.	The other environmental impacts have been considered and presented in the appropriate sections of the EA.
Impact on Boronia Rd/Juno Pde One of Bankstown Council's main concerns about traffic impacts is the potential for impact on the roads in Bankstown caused by the use of roads passing through residential areas.	Boronia Road / Juno Parade are State Roads and also permitted routes for B-Doubles. They have not been nominated for use by ILC vehicles, but identified as potential routes that could be used by vehicles accessing the ILC facility. Our modelling indicates that the volume of ILC traffic that would use these roads is low.
We note that Roberts Rd and Boronia Road have both been identified as suitable for use by trucks entering and leaving the facility. Whilst the EA shows that projected truck volumes for Boronia Street will be low, we object strongly to the use of Boronia Rd/Juno Pde as a route for trucks associated with this facility. The justification for trucks using Boronia Rd/Juno Pde is that it is classified as a State Road. Furthermore, the identification of Boronia Rd and Roberts Rd as State Roads has already lead to them being used in a way that has resulted in significant cumulative impacts and loss of amenity to the people that live along these roads.	The ILC traffic using Boronia Road accounts for less than 1% of future traffic (6 vehicles per hour in AM and PM peak). It is not considered that this will adversely impact on Boronia Road.
Other Impacts on Local Roads. Bankstown Council is also concerned about the possibility of truck movements along other roads with a residential character. Again this may arise from trucks leaving the facility and travelling along Roberts Rd from where they could easily attempt to access the Hume highway by using non - State roads such as Rawson Rd, Norfolk Rd (and other like roads).	The movement of ILC trucks through the residential area will be restricted, and managed through LATM measures to be undertaken in consultation with the RTA and Councils.
Another source of impact on the local roads which has not been assessed in the EA is the likely increase in the use of residential roads in the area by cars that are taking detours to avoid the state roads that will become busier as a result of the additional trucks using them. This matter has not been addressed in the EA, nor have any mitigation measures proposed. It could however be reduced if the issue of access to and from the site was reviewed such that essentially all of the access was not provided via Roberts Rd, and better levels of access were provided to Cosgrove Rd and the Hume Highway.	The ILC would not significantly impact on delays at intersections in the area. The potential for rat-running for large vehicles will be addressed through the LATM measures that SPC would develop in consultation with Council and the RTA. Rat-running by private vehicles is more difficult to manage without detrimentally impacting on the route choice of residents and local public transport vehicles. The ILC contributes to 1% of the traffic on the road network. Background traffic growth is the contributor to diminished future road and intersection performance.
Concerns about the Modelling Included in the EA. The underlying assumption is for container activity of 300,000 TEUs to generate traffic from the proposed development. However the EA did not assess the traffic impact as a direct result of the change in this assume throughput, that could eventuate if some of the other proposed intermodal terminals do not proceed, or if there is a variation in rail throughput:	The ILC is designed to handle up to 300,000 TEU per annum.
• The EA traffic models for the morning peak periods cover the one-hour time period within each of these peak periods. However the Sydney commuter road network has longer commuter peak periods. Ideally the morning model included in	The models used in the EA assess the peak one-hour period in the morning and afternoon. These are the periods of maximum impact. Assessment of one-hour peak periods is standard industry practice.

the EA should have had a 2 hour peak period from 7.00am - 9.00 am while the evening peak periods should have had a three hour period from 3.00pm - 6.00pm;	
• The EA traffic model was not benchmarked against the Transport and Population Data Centre's Metropolitan Strategic Travel model;	The 2005 base trip table has been calibrated for observed volumes at some 15 key locations in the Enfield area, identified in the EA.
• It is unknown how the existing base year trip matrix was derived. This could lead to considerable variations in the traffic impacts from the facility;	The trip table from which the base table was calibrated has evolved from previous projects, where calibration has also been undertaken.
• The traffic model included in the EA does not appear to have captured the effects of regional traffic surrounding the proposed facility, as the models were calibrated using counts undertaken within the immediate vicinity of the site. The use of RTA screenlines would have helped in this regard;	The counts collected for this project do include regional (as well as local) traffic that use the road network in the vicinity of the ILC. In the context of the study the model is not being used to forecast traffic diversion due to a new link or other network issue. The impact of the ILC is confined to a relatively small area (see Figure 2.2 of the EA Appendix B, which was discussed with the RTA at the commencement of the study). It is appropriate to concentrate on the sub-regional level rather than the wider network issues alluded to.
• The EA traffic model has not met major screenline calibration standards thereby resulting in less robust modelling results;	The cited additional calibration measures are only relevant to a regional model assessing wider implications of network change (eg a new link or road closure). The impact of the ILC is limited to the sub-regional level, and the adopted calibration process is appropriate.
• The EA indicated that the 2016 base trip matrix was developed using population and employment forecasts provided by DIPNR, but has not shown the changes between 2005 and 2016;	SKM used trips matrices for future trips relevant to 2016. The 2016 matrices have been used reliably by SKM for several years to forecast future traffic growth. Specific and significant changes were added to the matrices to reflect Port Botany Expansion and Sydney Airport forecast growth (as documented in the EA).
• The EA did not indicate which vehicle categories were included in the traffic model's commercial trip table nor did it explain the process applied for developing the future commercial trip table;	The commercial vehicle trip table includes an estimation of heavy vehicle activity, and was calibrated in the local area for 2005 counts. The future commercial vehicle matrix takes into account growth in industrial activity across Sydney.
• The traffic assignment technique used is also unclear and how commercial vehicles were converted into equivalent passenger car units;	The truck matrix in NETANAL is used to estimate the effect of heavy vehicles on link and intersection capacity. It is not used on a stand-alone basis. The proportion of heavy vehicles in the traffic stream is one of the inputs to the INTANAL intersection models.
	The PCU factors are documented in the working paper. The INTANAL default pcu factor of 2 for heavy vehicles was not modified for this project.
Some of these deficiencies may on their own be of minor significance. However, when considered cumulatively they indicate that it is simply not possible to have confidence about the findings of the traffic analysis. Given the significance of traffic impact to this proposal, this is a matter of great concern.	The modelling approach used for the EA is appropriate for the assessment of the impact of the ILC. The findings of the traffic study are supported by an analysis of existing conditions, which reveal that many intersections around the ILC are already approaching capacity. Future background growth in traffic volumes, independent of the ILC, are likely to result in conditions as outlined in the traffic study.
Concerns About Intersection Performance.	
In reviewing the EA, Council considered that it seemed to have glossed over the issue of intersection performance, and the adequacy of existing intersections.	The key intersections surrounding the ILC were analysed. The intersection analysis and reporting undertaken is appropriate for the assessment of the impact of the ILC.
One reason that we considered this to be the case was because of Councils knowledge of the road network in Bankstown. In particular, we know that the Roberts Rd/Norfolk Rd intersection is already performing very poorly, as there are often pronounced northbound delays along Roberts Rd in the AM peak. However, this did not seem to be suitably acknowledged in the EA.	The analysis undertaken was based on data collected by an independent traffic counting company, specifically for this project. While there may have been congestion experienced at times, conditions are such that satisfactory Levels of Service are achieved across the space of an hour. The analysis undertaken as part of the EA is industry standard practice.
To further consider the issue of intersection performance, PB were asked to address this matter by the "swept path" technique. This technique looks at the actual physical space occupied by	Swept path analysis was undertaken subsequent to the submission of the EA, to determine possible traffic

large vehicles as they turn through intersections, and provides a more thorough and reliable way of assessing intersection performance. The EAR did not include a swept path analysis of large vehicle movements at critical intersections, and Council (and PB) considered this to be a major deficiency in the traffic assessment.	management measures for the Roberts Road / Norfolk Road intersection. Subsequently, swept path analysis has been undertaken on Hume Highway / Cosgrove Road and Boronia Road / Roberts Road intersections. Strathfield Council and the RTA have previously (June 2005) undertaken tests with 25m B-doubles at Roberts Road / Norfolk Road. The testing indicated a problem with the left turn into Norfolk Road. This turn would be possible with intersection improvements (ie a splayed intersection approach – left turn in from Roberts Road). Council indicated no problems for other movements at this intersection with a 25m B-Double.
Intersections selected for a swept path analysis were: • Roberts Rd and Norfolk Rd • Roberts Rd and Juno Pde; and • Liverpool rd and Cosgrove Rd.	These intersections currently handle large vehicles and Norfolk Road, Juno Parade and Cosgrove Road are all permitted for use by B-doubles. As such the use of these roads by the ILC should not be a concern.
PB found critical shortcomings in the ability of all 3 intersections to accommodate heavy vehicles, and suggested that they would all need to be upgraded. Whilst some of the turning movements were found to be physically possible, it may have meant for example making a left hand turn from a through lane. This was found to be undesirable since it could increase the risk of collisions and put vulnerable road users at risk, as well as delaying through traffic. Similarly, a right turn should not have to be made from through lanes, particularly when heavy vehicle movements of some 1200 movements per day are expected.	It is noted that these vehicles may not be able to make certain manoeuvres from their designated lanes, but this is consistent with swept paths of trucks and some public transport vehicles across Sydney. The right turn from Roberts Road into Norfolk Road has a designated right-turn bay.
The PB report also provides other information concerning the review of intersection performance included in the EA. It notes that the EA only assessed intersection capacity by considering level of service and delays, and that it did not show the extent of queuing or the degree of saturation. Normally an analysis of intersection performance would, besides considering level of service and delay would also include a review of the degree of saturation of the intersection and queuing, as this provides a more comprehensive understanding about how the intersection is performing.	According to the RTA's Guide to Traffic Generating Developments, "the best indicator of the level of service at an intersection is the average delay experienced by vehicles at that intersection." The criteria for Level of Service outlined in Table 4.2 of the Guide relate to average delays only.
The failure in the EA to consider these aspects of intersection performance is an oversight and means it is not possible to have the necessary level of confidence in the findings of the EA regarding intersection performance	Given the growth in background traffic, the ILC contributes to <1% of overall traffic. As such the statement is considered to be unfounded.
Other Council Concerns about Traffic	
Regarding traffic volumes, the EA finds that these are acceptable because they will be just a small component of the projected traffic growth in the area, and that any impacts that will occur on the road network or intersection capacity will be due to the natural increase in traffic, and that the RTA will then need to fix the resulting problems to the arterial road network. This is a rather disingenuous response to the issue and ignores the fact that the Sydney Ports proposal is responsible for a large volume of the traffic that will cause considerable problems, and that the performance of the proposed facility will be impacted by congestion at key surrounding intersections.	The ILC will contribute <1% of traffic and its contribution to any network deficiencies will be very minor.
Internal Traffic Management. This matter has not been properly addressed. In particular, there is not enough detail on how truck movements and employee generated movements will impact, especially at time of shift change over. There are many industrial sites in Bankstown where shift changes generate serious traffic problems as employees try to access State roads. In this case the problem would be exacerbated with trucks also attempting to leave the site at what will be close to the peak projected time for truck movements to and from the facility. This issue needs further consideration, and again could be ameliorated to some degree if more heavy vehicle access could be provided via	The impact of shift changeovers would be mitigated by the diverse range of origins and destinations of staff, and the site layout. There would be greater use of Cosgrove Road by staff than there might be by trucks. Furthermore, many of the staff employed at the ILC would move from other jobs and may well be travelling at that time regardless.

Cosgrove Rd. Preferred Alternative Access Arrangement. Bankstown Council wishes to suggest an alternative access arrangement to and from the site, which is to provide primary access via Gould Street and Cosgrove Rd.	SPC previously considered numerous alternative access points for the site. The conclusion was that Norfolk Road / Roberts Road and Cosgrove Road / Hume Highway were the preferred access points. Access to the site via Punchbowl Road is not permitted. An analysis was undertaken subsequent to the EA of the one-way pair option. This indicated that while satisfactory operation of the 2 linked intersections (Gould Street and Cosgrove Road) would be achieved in the short term, with background growth the 2-lane eastbound constraint on the Hume Highway would result in unsatisfactory performance in the future without the ILC. Even with 3-lanes provided eastbound, the Cosgrove Road intersection would be at LoS E with 100% of ILC traffic using it. This is the same result as documented in the EA for 100% of ILC traffic using the Cosgrove Road intersection. Therefore it is not feasible to channel all ILC vehicles through this intersection. Furthermore, it would add further pressure to the Hume Highway / Centenary Drive intersection, as a large proportion of ILC trucks would use Centenary Drive. Only allowing access via Cosgrove Road would take traffic off the Centenary Drive / Roberts Road overpass and direct it through the at-grade intersection instead.

It should also be noted that a Traffic Working Group involving Strathfield Council, Bankstown Council and Roads and Traffic Authority and Sydney Ports Corporation has been in existence since May 2005, and to date has met 6 times. The objectives of the group are to:

- Identify council concerns about traffic;
- Share information about traffic impacts foreshadowed by the development;
- Focus on 'local' impacts ie impacts on local residential streets and also look at strategic road networks;
- Discuss and decide on strategies which could be used to mitigate these local impacts;
- Decide the way forward on the implementation of these strategies.

The group does not have the charter for implementing any measures, only to suggest and recommend to the relevant authorities. Sydney Ports Corporation with the co-operation of Councils and the RTA expects the Group to continue throughout the life of the operation of the ILC to ensure any local community issues on traffic surrounding the site are addressed in a responsive and constructive manner.

3.4.3 Noise and Vibration

Issue Summary

Noise impacts were identified by the community as of major concern. Of particular note were impacts due to construction activity, site operational works (especially night operations), increased general vehicle and truck movements in the locality of the ILC site, and the consequences of increased rail movements in the freight rail corridor. Vibration effects from trucks and trains were of concern to a number of people.

DEC and NSW Health also provided detailed submissions which addressed the issues of noise.

Responses

The main issues raised by the community were also addressed by DEC and NSW Health. Responses to the main issues raised by DEC and NSW Health are summarised in Table 3-5, below. Technical details, including supplementary modelling, are provided by Renzo Tonin and Associates (RT&A) in Appendix F. Rail noise is addressed in Section 3.4.5.

Table 3-5: Responses to Noise Issues

Construction Noise	
The construction noise levels provided in the EA indicates that there is the potential for an increased risk of health effects from noise exposure for all residences at various stages of construction. NSW Health indicated in its Director General requirements that noise impacts upon sensitive receptors should be specifically considered. This does not appear to have been addressed and consequently the predicted impact of construction noise upon St. Anne's School, Strathfield South High School and other sensitive receptors cannot be-ascertained. It is likely, as with many major construction projects in an urban area, that exceedance of noise goals will occur after feasible and reasonable noise mitigation measures have been used. Section 4.12.5 lists the proposed construction times as 7am to 6pm Monday to Saturday. However, the DEC advises that normal construction times should be 7am to 6pm Monday to Friday and 8am to 1pm Saturdays and no work on Sundays and Public Holidays. Works should not be conducted outside these hours unless there is specific justification for doing so. In addition a, a community consultation program and a 24 hour complaints handling system should be implemented prior to any out of hours works.	Construction noise was assessed in the report to the nearest affected residential receivers, as these were closer to the site than other sensitive receivers, including St. Anne's School and Strathfield South High School. Further to this the Strathfield South High School is shielded from the site by the industrial area to the north of the site and the existing noise wall along the southern boundary of the school. There are no DEC criteria that distinguish appropriate levels for residential receivers versus non-residential receivers and impacts at non-residential locations would be similar to or less than those identified for residential locations. Therefore the assessment that has been undertaken for the construction phase noise is considered appropriate. Limiting construction hours will serve to extend the duration of the works. SPC considers the slight increase in working hours on Saturdays is warranted to ensure the overall construction duration is as short as possible. SPC will seek to maintain the construction times as specified in the EA. However, an undertaking will be provided, and written into the Noise Management Plan, that high noise operations will not be undertaken after 1pm on Saturdays.
Operational Noise	
The statement of commitments for noise performance does not include a commitment to achieve acceptable noise levels at sensitive receiver locations, which, in this context means achieving noise levels that substantially comply with the Governments Industrial Noise Policy (INP). The NIA has indicated that, under noise enhancing weather conditions that have been determined to be a significant feature of the area, the proposal will generate noise levels that significantly exceed the INP PSNL. The predicted levels significantly exceed the levels that DEC would normally license to. On this basis the statement of commitments are not considered capable of delivering acceptable noise outcomes. NSW Health indicates that Table 11-7 (Chapter 11) of the Environmental Assessment highlights the predicted exceedances of operational noise criteria when compared to the NSW EPA Industrial Noise policy guideline values. It is noted that predicted noise levels for two of the six residential sites considered exceed criteria levels during calm and isothermal weather conditions even after mitigation measures are used. Exceedances are greater under adverse weather conditions with these adverse wind conditions expected to occur approximately one third of the year. The exceedances have been predicted to be as much as 15dB above criteria. It is of further concern that noise impacts	Mitigation options were extensively reviewed as part of the EA. It is considered that at this stage of the project, when the design is still fairly flexible, all reasonable and feasible mitigation measures have been considered to reduce overall noise emissions from the site. Additional mitigation will need to be considered at the design phase to reduce noise levels to achieve compliance with the Project Specific Noise Levels (PSNLs). Any further measures considered would include source specific measures, such as limiting plant noise levels and use of local shielding (eg container stacks, sheds, buildings) in specific locations. These more specific design matters are difficult to determine at this stage of the project. However, in response to DEC's concerns regarding noise exceedances, the most likely or typical operational scenario and additional mitigation measures have now also been modelled from all available information known at this stage of the project, and the results of this assessment are presented in the RT&A Technical Memo in Appendix F. It is noted that noise-enhancing wind conditions do not necessarily occur for one third of the year from any single direction. Instead they are expected to occur for a range of different directions depending on the time of year and time of day – see the RT&A Technical Memo in Appendix E, which presents the outcomes of a more detailed analysis on wind data. This shows that different noise receivers are impacted for different seasons of the year and at different periods of the day. Given the above and consistent with the noise modeling for the "worst-case" scenario so as not to unnecessarily prescribe the operation of the site at this stage, a "worst case" noise

up to 7dB above criteria are predicted at St Anne's school. It is noted that the predicted values are based on the assumption that all noise sources operate concurrently ("worse-case" assessment). However, the noise consultants report noted that there is little to no reduction in noise impact between a "worse-case" scenario and "normal-case" scenario.	model was built and a conservative assessment was undertaken and presented in the NIA in accordance with all relevant noise policies and guidelines. The RT&A Technical Memo presents areas of conservatism which are built into the assumptions used in the NIA noise modelling for assessing impacts at night, and what effect each of these would have if one were to model a more realistic, likely or typical night operational scenario at this stage of the project. So in response to this, typical operational scenarios have now also been modelled from all available information known at this stage of the project, for the Day, Evening and Night periods respectively. For each of the three assessment periods, noise was modelled for calm conditions and for the worst-case wind conditions. Separate noise models for the 'intrusiveness' and the 'amenity' assessment periods, were run to allow for the direct assessment of impacts for each scenario during each of the three assessment periods. The results of these assessments are presented in the RT&A Technical Memo in Appendix F. In summary compliance is achieved with both the 'Intrusiveness' and the 'Amenity' PSNLs under calm and worst-case noise-enhancing wind scenarios, at all receivers with the exception of a few minor exceedances during adverse wind conditions of 1-2dB(A) at 3 locations and one 5dB(A) exceedance under adverse wind from one specific direction. These results do not include further additional noise mitigation measures, such as those discussed in the RT&A Technical Memo. Therefore, there is scope to further reduce noise emission levels from the operation of the site as part of the Detailed Design / EMP phase in order to comply with the PSNLs. Any further measures considered at the detailed design stage would include source specific measures, such as limiting plant noise levels and use of local shielding (eg container stacks, sheds, buildings) at specific locations etc as described in the RT&A Technical Memo in Appendix F. After all reasonable and feasible measures are considered at the detailed design stage all physical and management noise control measures will be incorporated into the EMP for the site to ensure the PSNLs are achieved.
Intermittent /instantaneous noise generation was assessed through the NSW Environmental Noise Control Manual in the form of a sleep arousal criterion. Exceedances of these criteria are predicted in all weather conditions, some by as much as 15dB (giving a 30dB increase from background). As this development intends to be an ongoing 24hour/7day a week operation it is important that community noise impacts strictly comply with noise criteria and it would be desirable to reduce this level below this criteria where practical. Intermittent /instantaneous noise generation should be kept to a minimum to reduce any potential adverse effect on health through both sleep disturbance and annoyance.	See response to DEC issue related to sleep disturbance (below).
The DEC notes that the Noise Impact Assessment presents only the result of an assessment of potential noise enhancing weather effects. The meteorological data used and the weather station location has not been presented in the NIA.	The NIA presents predictions under both calm-isothermal (acoustically neutral) conditions and adverse weather (noise-enhancing wind) conditions. The weather stations from which the meteorological data were acquired are Bankstown Airport AWS and the Lidcombe AWS. Information regarding wind was based on available AWS wind rose data – see the RT&A Technical Memo's Annexure 1 (in Appendix F). According to the NSW INP, prevailing winds above 3m/s (11km/h) are not considered in noise assessments as they do not increase noise impacts. Furthermore, noise measurements should not be undertaken when wind speed exceeds 5m/s (18km/h).

The DEC notes that the noise modelling considered two broad operating scenarios. The difference between the two scenarios is that Scenario 1 included both shunting locomotives (2x48class) and locomotives involved in moving a train set on to the site (3x81 class), while scenario 2 only considered the shunting locomotives. It should be noted that it is DEC's experience that older and noisier locomotives also operate on the Botany Goods Line.	SPC advised that, based on current information, 48-class locos will typically be used as 'shuttle trains' and 81-class locos will be used for rural bound trains. The issues of older and noisier locomotives are a result of new entrants to compete in a deregulated freight rail market. As the percentage of container movements by rail increases, the improved economic certainty will increase the commercial viability for further investment in more efficient rolling stock.
The NIA does not indicate the number of residences potentially affected by noise levels that exceed the Project Specific Noise Levels (PSNL) under noise enhancing weather conditions. The DEC notes that Table 4.12 in the NIA indicates that under calm isothermal conditions that 140 houses are predicted to experience noise levels slightly above the PSNL. The number of houses with significant exceedances above the PSNL during noise enhancing weather conditions is likely to be significantly more.	It is noted that the number of houses affected shown in Table 4.12 of the NIA is high as the noise model was conservative in not taking into account local shielding provided by residential and other non-industrial buildings off site. Such building data was unavailable for inclusion in the noise model at this stage. It is intended that building data be included in the detailed noise model to be run at the Detailed Design / EMP phase, which is expected to show a significant reduction in the number of houses affected. Therefore, an analysis of the number of affected houses would be more accurately conducted at the DD / EMP phase and after all additional reasonable and feasible noise mitigation options, as set out in the RT&A Technical Memo (in Appendix F), have been incorporated into the noise model.
It is clear from the NIA that widespread and significant exceedances of the PSNL are predicted. (In this case the PSNL are determined from the amenity criteria). Importantly, predicted noise levels are normally used to establish appropriate noise limits for an operation (where applicable). In cases where it is not possible to achieve the PSNL even after applying all feasible and reasonable mitigation measures, predicted noise levels may be used to set noise limits that are up to 5 dB above the PSNL following negotiation with the regulator and/or consent authority. In contrast, negotiated agreements would normally be required where predicted levels are still more than 5 dB above the PSNL after the application of all feasible and reasonable mitigation measures. In view of the likely number of noise-sensitive receivers affected by exceedances of the PSNL and the magnitude of these exceedances, it is recommended that: - Further mitigation measures are investigated with a view to reducing the extent and magnitude of exceedances of the PSNL to within an acceptable range, including through the use of best-practice rolling stock on the ILC site; and - Additional consideration is give to the extent to which negotiated agreements may be feasible and reasonable mitigation measure, for example land use mapping with overlaid noise contour plots.	Exceedance of the noise criteria was predicted after the application of mitigation measures, but only during adverse wind conditions and mostly in terms of the 'amenity' criteria. The modelling conservatively assumes that the site is operating at capacity and all plant is operating at full load over the entire night-time 9 hour assessment period. As this is unlikely to occur, then the typical operational scenarios have now been modelled. The results of these assessments are presented in the RT&A Technical Memo in Appendix F. In summary compliance is achieved with both the 'Intrusiveness' and the 'Amenity' PSNLs under calm and worst-case noise-enhancing wind scenarios, at all receivers with the exception of a few minor exceedances during adverse wind conditions of 1-2dB(A) at 3 locations and one 5 dB(A) exceedance under adverse wind from one specific direction. These results do not include further additional noise mitigation measures, such as those discussed in the RT&A Technical Memo, therefore, there is scope to further reduce noise emission levels from the operation of the site as part of the Detailed Design / EMP phase, when more specific details about the site and its operations are known, in order to comply with the PSNLs. After all additional reasonable and feasible measures are incorporated into the design at the Detailed Design /EMP phase (as set out in the RT&A Technical Memo in Appendix F), it is expected that the PSNLs will be achieved.
The DEC advises that the exceedances of the sleep disturbance screening criteria are significant. Current DEC guidelines recommended that where the screening criteria is exceeded that a more detailed analysis is required. The detailed analysis should cover the maximum noise level or $L_{A1,(1minute)}$, the extent that the maximum noise level exceeds the background level and the number of times this happens in the night period. Some guidance on possible impact is contained in the review of research results in the appendices to the Governments Environmental Criteria for Road Traffic Noise (ECRTN). Other factors that may be important in assessing the extent of impacts on sleep include: • how often high noise events will occur; • time of day (sleep disturbance is normally taken to occur between 10pm and 7am);	The DEC's sleep arousal criterion is currently being reviewed, as the general opinion is that this criterion is conservatively low. For the NIA, guidance was taken from the EPA's ENCM, which provides a conservative criterion, and the ECRTN, which sets a suitable criterion which will ensure that 90% of the population (including the aged) are protected in their sleep, based on recent research. However, it is understood that the current DEC position is that an initial screening test should be carried out to determine whether instantaneous noise sources at night comply with the criteria established in the ECRTN. If noise levels are found to exceed, more detailed analysis is required to determine the extent of potential disturbance to sleep, based on the number of events, timing of events etc. It is unlikely that this level of detail can be provided at this early stage of the project. This matter would be better

• whether there are times of day when there is a clear change in the noise environment (such as during early morning shoulder periods). The NIA concludes that "under calm and isothermal conditions the levels remain below 65dB(A), which is considered to be the level that could cause arousal based on more recent research...". The reference to 65dB(A) comes from the Environmental Criteria for Road Traffic Noise (ECRTN) Appendix B which presents the results of limited studies regarding awakening reactions. The research suggests that maximum internal levels not exceeding 50-55dB(A) are unlikely to cause awakening reactions. It is generally postulated that a 10dB transmission loss occurs between a typical residential facade with windows open to allow minimum Building Code of Australia ventilation requirements, hence the reference to an external level of 65dB(A). Whilst the material in Appendix B to the ECRTN may be used as part of an assessment of sleep disturbance impacts, it should not be relied upon as being capable of informing an objective criteria. Other factors such as the number of times the maximum noise levels events are likely to occur during the night time period and the nature and character of the noise needs to be considered.	addressed at the design stage as part of the EMP, when details of site operations are known. Notwithstanding this, a more detailed analysis of sleep disturbance issues is carried out and included in the RT&A Technical Memo (Appendix F), based on several assumptions.
Road Noise	
NSW Health notes that current road noise levels are already between 7 to 21dB above the criteria set in DEC Environmental Criteria for Road Traffic Noise. The predicted additional noise generated from this proposed development falls within the 2dB increase allowed under the DEC Environmental Criteria for Road Traffic Noise. Despite this compliance additional mitigative options should be pursued in view of the pre existing noise impacts experienced by affected residents. DEC indicates that Table 5.4 in the NIA indicates that predicted 2016 LAeq,15hr and LAeq,9hr noise levels, including ILC traffic, will not result in a greater than 2dB increase in existing traffic noise levels. It appears that the predicted 2016 LAeq period levels have also taken into account natural traffic growth (growth would occur regardless of the ILC), and hence the predicted levels are conservative. It would however be beneficial for the traffic noise increase associated solely with ILC traffic be reported. However, it should be noted that the traffic noise levels being experienced on Liverpool Road and Roberts Road significantly exceed the Roads and Traffic Authority's (RTA's) definition of acute traffic noise exposure (ie acute traffic noise levels are levels exceeding L.Aeq,15hr 65dB(A) and LAeq,9hr 60dB(A)). This should be considered in the context that one of the objectives of the ILC is to reduce acute traffic noise impacts in the area around Port Botany. The number of residences experiencing acute noise levels has not been identified. This is not a criticism of the NIA, as that level of assessment is not normally undertaken. However, given the government objective of reducing road traffic noise increases on roads surrounding Port Botany, it would seem logical to consider the extent of traffic noise impact in the vicinity of the proposed ILC in terms of exposure to acute noise levels.	The project is not responsible for existing road traffic noise levels. The contribution to traffic noise from this project is calculated to be in the order of 0 – 0.2dB(A) at residential receiver locations – refer to the RT&A Technical Memo (Appendix E). Such a small traffic noise increase is considered minor, insignificant and inconsequential. Furthermore, the NIA found that mitigation of existing noise, through the provision of noise barriers for residences is not possible as driveway access to roads is required. Therefore it would not reasonable and feasible to reduce traffic noise levels. The assessment carried out in the NIA, compares 2016 traffic noise levels (with ILC) to 2006 future-existing noise levels (without ILC). This type of assessment is considered to be more conservative than a direct comparison in 2016. Nonetheless, an assessment which compares traffic volumes for with and without ILC (ie natural growth only) is attached in the RT&A Technical Memo (in Appendix F). It is agreed that this is not usually required as part of this sort of assessment, but it could be considered during the DD/EMP phase. That is, the number of residences exposed to acute noise levels (with/without ILC) will be identified more accurately during the Detailed Design /EMP phase. These will be identified and appropriate consultation / mitigation strategies put into place to work with the residents to minimise impacts.
Cumulative	
It is important that cumulative predicated impact of road and rail be added to the predicted operational impacts to determine a more accurate prediction of noise impacts. We	Cumulative noise impacts have been considered to the extent that NSW noise policy allows, through the application of the amenity criteria. It is noted that in NSW road, rail and

note that cumulative impacts of road and operational noise may be significant to the northwest of the proposal (residences located between Norfolk Road, Hume Highway, Roberts Road and Waterloo Road). Cumulative rail and operational noise impacts may be significant to the southeast of the proposal (residences located in the vicinity of Bazentin Road, Belfield).	industrial noise are assessed to their own separate criteria, as different types of noise are perceived differently in the community. There are currently no overall criteria that address total environmental noise.

Vibration was addressed in the EA. The types of activities carried out on site during both construction and operation are unlikely to cause significant ground vibration beyond 25 m from the source. Given that the nearest potentially affected premises to the ILC are more than 50 m away, it is unlikely that ground vibration will be an issue on this site.

There will be no substantial change in truck traffic volumes on any road near residential areas. Therefore, there will be no change in existing vibration conditions due to traffic.

3.4.4 Air Quality

Issue Summary

Concern was expressed by the community over, amongst other things, the impacts of dust during construction, general air pollution caused by an increase in trucks in the area and the effects of diesel operations on the site and on the rail line.

DEC and NSW Health addressed construction and operational air quality issues in some detail. Given the indication of exceedance of PM_{10} criteria during construction and the potential for it during operation, DEC noted that a further developed mitigation strategy appears necessary to prevent impacts from both construction and operation activities. DEC recommended that a revised air quality impact assessment that demonstrates compliance to appropriate criteria should be developed in parallel (or iteratively) with:

- development of more detailed construction and operation air quality management plans;
- Development of a refined air quality impact mitigation strategy to prevent impacts; and
- All technical issues (including impacts from off site activities) being addressed through additional assessment work.

In particular, DEC considers that further assessment work is required to develop a final suite of mitigation actions that will ensure that appropriate air quality outcomes are achieved during the construction phase. Importantly, it indicates predictions of 1 to 27 days annually in excess of 24-hour PM_{10} criteria (with and without mitigation in place) required refined modelling approaches, greater refinement of modelling assumptions or a revision of operation and construction plans or a revision of the mitigation strategy, or all of these.

Response

In terms of the issue of construction dust raised by the agencies and the community, the EA clearly identified that despite some exceedances of the criteria used, the dust generated by the proposed construction works would be able to be managed adequately. A detailed Dust Management Plan will be

developed before construction begins. With the benefits of better knowledge of the construction schedules and methodologies, the DMP will provide more detailed mitigation measures to manage the dust levels so that the criteria are not exceeded. This would include real time monitoring of dust levels and a response process to manage them.

Our response to DEC's specific comments on construction dust and the choice of air quality criterion is provided below.

For the PM_{10} air quality assessment (both construction and operational) we used the NEPM criteria of 50 ug/m^3 (24 hour) with 5 exceedances allowed rather than the DEC criteria of 50 ug/m^3 with no exceedances allowed. The DEC criteria are considered too stringent for assessment of construction phase PM_{10} when existing air quality is taken into account. As a demonstration of this the background air quality data for Lidcombe, which was used for modelling purposes and is shown in the attached memo (Appendix G), provides the the highest background PM_{10} (24 hour) approaching 40 ug/m^3. In modelling PM_{10} impacts it can be seen that an impact from construction greater than 10 ug/m^3 could result in a single exceedance of this criteria. An allowance of 5 exceedances per year is considered more reasonable and workable, particularly in light of the fact that in many other jurisdictions eg. US and Qld (within Australia) far less stringent criteria are applied, eg. 150 ug/m^3.

The PM_{10} modelling methodology for construction phase impacts is considered reasonable, whereby initially the modelling was undertaken with no dust controls measures in place, and as expected impacts showed exceedance of the relevant criteria. Various dust control measures were progressively implemented until a level of control was achieved that showed impacts could be effectively managed. These controls included sealing of some surfaces that would be otherwise left unsealed, high level watering of the site and wind speed and wind direction restrictions, which may be required. In reality dust impacts will be managed by various means, including the physical controls assumed in the modelling and a sophisticated real-time PM_{10} monitoring program which will advise the construction contractor of any dust impacts within sensitive receiver locations should these occur. The contractor can then (almost immediately) alter construction works which may include restriction of works at certain locations in certain wind conditions such that impacts are effectively managed, without any exceedance of the relevant criteria. A protocol will be devised to determine the appropriate response to readings greater than 50 ug/m^3.

The PM_{10} criteria of 50 ug/m^3 (24 hour) is a very stringent criteria and generally as PM_{10} levels approach the criteria value there would be not perceived deterioration in air quality that would enable an operator to pro-actively implement controls to mitigate impact. It is noted, however, that the PM_{10} criteria is a 24 hour criteria and site operators will have instant access to real-time PM_{10} data under the monitoring program proposed. As such, as instantaneous PM_{10} levels reach some pre-determined threshold value, control measures can be implemented and total PM_{10} impacts within the 24 hour period can be mitigated so that the criteria is achieved.

In considering DEC's comments on operational impacts, the PM_{10} criteria of 50 ug/m3 (24 hour) is not exceeded by worst-case impacts (background + impact levels) on any occasion (nil exceedance) within

residential areas surrounding the ILC. This is shown in Table 7-7 and Figure 5 of Appendix F of the EA (Air Quality Study).

The issue of locomotive emission factors was raised. With respect to the on-site equipment the US EPA provided the only available set of "robust" emission factors for the type of equipment proposed, and Tier 3 best coincided with the likely year when this equipment would be required at Enfield. It should be noted in terms of NO_2 the predicted operational phase impacts (on-site equipment / trucks / trains) are well below DEC 1-hour and annual criteria, at most 77 % of the 1-hour criteria, for the worst-case including background levels. In the case of PM_{10} where impacts are only marginally less than the 24-hour criteria it should be noted that there is no difference in particulate emission factors for Tier 0, 1, 2 and 3 equipment, for the relevant engine sizes considered in the assessment.

At a meeting with the DEC comment was also made with respect to locomotive emission factors in particular the sulphur content of diesel, in so far as how this would impact on particulate emissions. The locomotive emission factors were taken from NPI, 1999 and controls applied as per USEPA420-F-97-051. The quoted diesel sulphur content in NPI, 1999 is 0.18 % which is less than the percent which will be used by locomotive diesel engine at the time the ILC becomes operational. Hence, the sulphur content data used is considered conservative in terms of both calculation of particulate emissions and SO_2.

The potential for road traffic air quality impacts was clearly identified in the EA and the impacts were assessed as negligible.

3.4.5 Rail Operation

Issue Summary

A number of submissions noted that the Environmental Assessment does not include any information on the environmental impacts from the increase in train numbers on the freight line as a result of this proposal and the ongoing expansion of Port Botany.

Marrickville Council indicated that matters relating to rail nose and vibration (on the freight train line between Port Botany and Enfield) have not been properly addressed. It was considered unacceptable that neither the Environmental Assessment for the proposed Enfield Intermodal Logistics Centre, nor the Port Botany Expansion EIS, has undertaken a full and accurate assessment of the noise and vibration impact of freight rail trains (moving between both facilities) upon dwellings located in the Marrickville LGA. Rather than conducting any original assessment of the impact of freight rail noise and vibration upon dwellings in the Marrickville local government area (LGA), the Environmental Assessment simply makes reference to the assessment contained in the Port Botany Expansion EIS of early 2004. Marrickville Council has serious concerns regarding the methodology which Sydney Ports Corporation has used (with regards to both the expansion of Port Botany and the proposed Intermodal terminal at Enfield) in regards to the impact of rail noise and vibration. Due to these serious and ongoing concerns, Marrickville Council requested that the current Intermodal Logistics Centre proposal not be approved - until such time as Sydney Ports Corporation has conducted a full and accurate assessment of the noise and vibration impact that freight trains (including the additional trains as a result of an expanded Port

Botany and an intermodal terminal at the Enfield marshalling yards site) travelling between Port Botany and Enfield would have upon dwellings in the Marrickville local government area - with the assessment making commitments in regards to consultation with affected residents, and the installation of noise mitigation works which would result in compliance with Environmental Protection Authority rail noise criteria.

Similar comments were offered regarding problems associated with old and inefficient locomotives using the freight line, and the potential impacts on air quality due to this increased level of emissions.

The DEC'S position on the rail noise assessment for the Botany Goods Line is that no holistic and well informed analysis of the potential noise impacts arising from the Governments Policy of increasing rail modal share of port related traffic has been undertaken. More importantly, the responsibility and commitment to an assessment, and where necessary noise mitigation, is not clear.

The DEC also emphasises that the EA has not explored the extent to which the use of best- practice rolling stock could be used to reduce the rail-related impacts both at the ILC and along the rail corridor between the ILC and Port Botany. It is the DEC's experience that valuable reductions in noise can be achieved through the use of modern rolling stock. It is noteworthy that the EA assumes a class of locomotives for shunting that have typically been in service for 35 to 40 years and a class of mainline locomotives that have typically been in service for 20 to 25 years. The DEC indicated that options for best-practice rolling stock that could be considered for the ILC include:

- modern locomotives that achieve the current locomotive noise criteria;
- multi-pack container wagons, to reduce the extent of noise generated by stretching and bunching of the train;
- ECP braking technology to allow for smoother braking; and
- the use of hybrid locomotives for shunting.

The DEC considers it would be appropriate to further assess the feasibility and reasonableness of using best-practice rolling stock to deliver improved noise outcomes, particularly given the extent of exceedances of PSNL and the current high levels of rail noise along the Botany to ILC rail corridor.

Responses

The EA outlined that, if the NSW Government policy that 40% of containers to and from Port Botany are to be carried by rail by 2011, the number of freight trains using the dedicated line from Port Botany would increase significantly beyond current levels, regardless of whether the ILC at Enfield is developed or not. The proposed ILC would not be generating more freight trains along the line. Rather, it would provide a loading / unloading point for some freight trains that are expected on and must use that line. The management and regulation of noise and vibration issues on the freight line is a matter for RailCorp (the current Environment Protection Licence (EPL) holder), the likely future EPL holder (ARTC) and the regulator of the licence (Department of Environment and Conservation (DEC)).

The operation of the rail transport of freight to and from Enfield falls within the existing operating licences for the freight line. Impacts were discussed in Chapter 8 of the EA, and no further assessment is considered to be required.

However, it is noted in the DEC's comment on the rail noise assessment for the Botany Goods Line that no holistic and well informed analysis of the potential noise impacts arising from the NSW Governments aim of increasing the rail modal share of port related traffic has been undertaken. As a consequence the responsibility and commitment to an assessment, and the necessity for the application of feasible noise mitigation measures, is not clear.

Sydney Ports acknowledges DEC's concern, and in response to this Sydney Ports is prepared to participate in any interagency working group established to address rail noise impacts along the dedicated freight line. It should be noted that Sydney Ports, as a condition of consent for the Port Botany Expansion project, will establish a Rail Noise Working Group to address rail noise issues along the Freight Line between Enfield and Botany Yard. This group includes Sydney Ports, RailCorp, DoP, ARTC and relevant councils and community members. Consultation with relevant regulatory authorities including DEC would also be undertaken.

3.4.6 Pollution (Light Spill)

Issue Summary

A number of submissions focused on the effects of pollution on the amenity and health of residents. These included:

- The effects of air, noise, vibration and lights from the increased numbers of trucks on main roads and other roads;
- The effects of noise from rail operations; and
- The impacts of light spill on the residents near the site.

Air, noise and vibration are addressed elsewhere. Light spill is addressed below.

Response

The effects of light spill were investigated in the EA (Chapter 16) and the Appendix I – Visual Assessment. The impacts of light spill were investigated to determine, in particular, the impacts at night. A preliminary lighting concept was developed for the purposes of modelling light spill. This concept comprised:

- Light poles spaced 80 m apart in the empty container and intermodal terminal areas, with fittings placed 25 m high;
- Illuminance levels set for safe operating procedures on the site; and
- Configuration of lights to direct onto the site and obtain minimum spillage into surrounding areas.

Light spill was modelled from the empty container areas at the northern and southern ends of the site as these would be the closest parts of the ILC to residences. Modelling results were compared against the

relevant standard *AS4282 – Control of Obtrusive Effects of Outdoor Lighting* recommended maximum obtrusive light levels. Recommended illuminance limits are strictest during "curfewed hours" (11pm and 6am). These are 4 lux at the boundary of commercial and residential areas, 2 lux within residential areas described as "light surrounds" and 1 lux in residential areas described as "dark surrounds".

Light spill (illuminance) levels were modelled in the vicinity of several of the nearest residences. The modelled light spill levels of 0.02, 0.01, 0.01, 0.02, and 0.00 lux are all considerably lower than the strictest of the limits listed in AS 4282, the light modelling indicating that the proposed lighting would be successful in containing light within the site. The light levels predicted at the nearest residential levels would be virtually imperceptible to people in those areas. The modelling showed that anywhere beyond approximately 140m from the site boundary would be subject to no measurable light spill.

AS 4282 also includes recommended limits for "luminous intensity" which relate to direct views of lights. The assessment of direct views of lights in the light spill assessment was undertaken qualitatively. Light fittings would be visible at night from most of the key viewpoints assessed. However, these would not be expected to change the night landscape as the lights would be focussed downwards and would be part of a landscape already containing a large number of light sources. It is unlikely given the downward focus of the proposed lighting, that direct views of lights would be regarded as obtrusive.

3.4.7 Socio-economic and Amenity

Issue Summary

Although acknowledging the economic importance of NSW of being able to cater for an expected increase in containerized trade over the coming decades, many respondents were particularly concerned about the wider environmental and health impacts of vastly increasing the movement of freight in the region.

Many comments were received arguing that the site is completely unsuitable for such a facility, given its proximity residential areas and the adverse community and environmental impacts the redevelopment would create. It was suggested that there would be effects on the community, the environment and the roads. Dramatic increases in the number of trucks going along our roads and rail to and from the site as under the proposal will result in more traffic, more pollution, more noise, increased risk of road accidents and increased health risks.

Disruption to existing businesses during the construction phase was indicated and it was suggested some means of mitigating that disruption and the consequent loss of business needs to be considered either by way of condition or by State Government compensation. Additionally, there was concern about the future of local businesses once site operations commence, especially along the northern end of Cosgrove Rd and in Norfolk Rd east, all of which are heavily dependent upon on-street parking, should a future local area traffic management plan ban on street parking.

It was suggested that, given the demographic profile of Strathfield residents, it is unlikely that a great many job opportunities will be opened up by the presence of an intermodal terminal for locals. Further, employment is more likely to be of a "relocational nature" than new jobs created.

Response

The local government areas of Strathfield, Bankstown and Canterbury support a growing population which is ethnically diverse. These councils maintain a range of schools and community facilities within the local area, although none will be directly affected by the proposal.

The consequences of the development on air quality, noise and traffic operations (roads) are addressed elsewhere in detail in the EA and in this report. The EA Chapter 17 summarised the social impacts which may result from the proposal.

Noise resulting from the 24 hour site operations concerned many residents, and 'sleep arousal' was considered in the noise investigations. Instantaneous noise generated by industrial noise sources would be managed so as not to exceed the sleep arousal criteria at residences once all reasonable and feasible noise mitigation measures had been implemented, in accordance with the EMP.

It was noted that noise from site operations and truck movements could potentially affect areas in close proximity to the site, generally residences and industrial properties along Cosgrove Road and residential properties on the western side of Roberts Road. Noise during the operational stage would be managed through an Environmental Management Plan that would focus on noise reduction at source and the use of acoustic barriers. Further discussion is provided in the RT&A technical memorandum (Appendix F).

The traffic assessment found that there would be no significant impact generated by heavy vehicles using the ILC and that this traffic would use arterial and state roads to minimise noise impacts on local residents.

Air quality studies have shown that there will be no exceedances of air quality guidelines from vehicles visiting the site, vehicles used on the site or locomotives during operation. The surface of the proposed ILC is to be sealed, limiting opportunities for dust creation during operation. Modelling undertaken as part of this assessment identified that impacts in terms of particulate matter are considered insignificant. Furthermore, the studies demonstrate that increased vehicle movements on classified roads surrounding the proposed ILC site, which may experience increases and/or decreases in vehicle traffic as a result of the project, will not affect overall air quality in the area.

The consultation processes have identified community concerns regarding air quality, noise and risk of accidents which may have an impact on health. These issues have been reviewed in technical studies to identify the likely impacts and to develop management or mitigation measures. Concerns about the potential risks, real or perceived, could impact on health through anxiety or stress. The potential for psychological health impacts varies from individual to individual.

Stress and anxiety associated with perceived risks can be reduced through communication with the community to inform individuals about the management measures employed to minimise risks and to provide opportunities for feedback.

A key benefit provided by the proposed ILC site for the community is the employment opportunities it creates during both the construction and operation phases and the potential for stimulating commercial and light industrial activities within the surrounding industrial area.

3.4.8 Property Values

Issues Summary

Members of the community raised concerns that the development of the proposed ILC would have negative implications for property values.

Response

Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices.

The site is in a derelict state and has not been extensively used since marshalling yard activities ceased. The surrounding area is also predominantly industrial and a more active industrial appearance on the proposed ILC site may be of some concern to local residents. In terms of impacts on visual amenity, visual analysis of the site identified that there would be limited views from the surrounding residential streets. As such the proposed ILC would have a low visual impact due to the long viewing distances. Noise mounds along the eastern boundary of the site would limit views from industrial premises along Cosgrove Road with visual improvements for residents in the southern end provided by the Community and Ecological Area. Landscaping would reduce visual impacts from the noise mounds.

Redevelopment of the site has the potential to encourage businesses associated with freight movement and intermodal activities into the surrounding industrial area. This may result in an increase in the number of operations associated with freight storage and handling and the potential replacement of unrelated businesses. A positive land use outcome is likely to result through encouragement of ‘clean’ development such as freight handling facilities.

3.4.9 Land Use

Issue Summary

Many submissions argued that the site is completely unsuitable for an intermodal facility given its proximity residential areas and the adverse community and environmental impacts the redevelopment would create.

Responses

The land is zoned for railway purposes and the surrounding area is predominantly industrial. Access from the site to the main road network is through industrial lands and impacts on residential areas will

be negligible. A series of mitigation and management measures are proposed to ensure that operation of the site will have a minimal impact on sensitive receivers.

3.4.10 Consultation Process

Issue Summary

The major issues raised by the community were:

- Residents were not consulted or informed adequately by Sydney Ports Corporation about the proposal. It was suggested that, during consultation with local residents, the community consultation information detailed in the Environmental Assessment had not been distributed;
- No effort has been made to make the information accessible in different languages. Given the cultural background of the local community and the high population of non-English speaking residents, this was regarded as of major concern; and
- There was a lack of adequate community or council consultation prior to the release of the EA during the summer holidays when the community was otherwise engaged.

Response

Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated web site also provided information about the project, the development process and the way by which the community could have its say.

Two community days were held - one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA.

Council briefings were held for Strathfield, Bankstown, Canterbury, Burwood and Marrickville at the beginning of the process and during the exhibition of the EA. Briefings were offered to a number of community groups. These were accepted by NOPE and the South West Environment Centre.

Three newsletters were widely distributed in the area, by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups ands residents. The newsletters were distributed in March and June 2005 and in January 2006.

Advertisements concerning the open day were placed in local papers, including community language papers - Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material.

The exhibition period was decided and controlled by the Department of Planning. It lasted from 9 January to 20 February 2006, taking into account the holiday period, and accordingly was longer than the statutory period required under the Environmental Planning and Assessment Regulation.

Sydney Ports will continue to consult with the community during construction and operation of the ILC, should it be approved. It will provide for Community Liaison Groups throughout the construction and operation of the ILC, as part of this continued consultative process.

3.4.11 Community and Ecological Area

Issue Summary

Strathfield Council indicated the ecological area provides an opportunity to provide secure habitat for the Green and Golden Bell Frog if it is appropriately designed and linked into a network of habitat in Greenacre. The proposed Community and Ecological Area is a worthwhile concept and should be vested in Council ownership as Community land so it may be open to the general public with the exception of ecologically sensitive areas. The land should be protected with appropriate caveats on title and open space and environmental protection land zonings.

A detailed Landscape design of the Proposed Community and Ecological Area needs to be completed with input from Council. Considering the size and impact of this proposed development it is requested that the following contributions be made to the local community:

- the ownership of the proposed Community/Ecological Area is handed over to Council; and
- Sydney Ports contribute to the full cost of the ongoing maintenance of this facility.

Responses

SPC will consult with DEC and Strathfield Council over the management of the Frog Habitat Area. Opportunities for future ownership, land use zoning and management will be determined at a later date.

Landscape design and species planting would be prepared as part of the detailed design process. Species selected for the site would be endemic to the area and sourced from local provenance. SPC will consult Strathfield Council during the preparation of the detailed Landscape Plan.

3.4.12 Flora and Fauna

Issue Summary

Strathfield Council notes that the ILC site contains marginal habitat for Green and Golden Bell Frogs. They state that, although true, each individual lot in Greenacre contains marginal habitat. It is the combination of these sites that provides the total habitat. As such it is not appropriate to consider the site in isolation, but rather as a key component of a series of fragmented habitats that when considered together make up the total habitat. The Green and Golden Bell-frog recovery plan identifies this population as one of only 8 key populations in Sydney.

It is further stated that no baseline information is provided in the EA on the total population of Greenacre Bell Frogs and as such the overall goal or carrying capacity of the Ecological area is unknown. This needs to be coordinated and established between Sydney Ports, the Department of Environment and Conservation and Strathfield Council. Such consideration will assist in determining the balance between habitat and community functions in the ecological/community use area.

Responses

The Frog Management Plan will be prepared in consultation with DEC and Strathfield Council. Connectivity between frog habitats would be a key consideration when designing the Frog Habitat Area. It will be constructed according to the detailed design prepared, which would take into consideration the

carrying capacity and the area would be managed according to the Frog Management Plan. Monitoring of the Frog Habitat Area will be undertaken to ensure it is functioning as designed.

3.4.13 Site Soil Contamination

Issue Summary

Strathfield Council and DEC but refer to the need for a Remediation Action Plan (RAP) to be prepared prior to remediation work commencing. This should be prepared in accordance with DEC guidelines, SEPP 55 and the *Contaminated Land Management Act 1997*. The RAP should include provisions for inspection and validation of soils beneath existing structures when they are removed and any hotspots that are uncovered during site development works. Following remediation, all exposed surfaces are to be validated to ensure that all TPH, asbestos and heavy metal contamination has been removed.

Further investigations are required to determine the significance and extent of contamination in certain areas, including the area west of Stockpile 4 in regards to elevated concentrations of arsenic that exceed the Open Space criteria, and the DELEC site in regards to TPH and copper concentrations.

Responses

A RAP is to be prepared and identified contamination to be remediated prior to earthworks commencing. Soils from beneath removed buildings would be visually inspected and testing undertaken if evidence of contamination is present or if the soils are observed to be different from the surrounding area.

Validation testing of remediated hotspots and all exposed surfaces is to be undertaken to ensure contaminant levels are below threshold levels defined within the RAP.

Further investigations are to be undertaken into the contamination hotspot (Arsenic) within the proposed Community and Ecological area to determine the significance and extent of the elevated levels prior to assessing remediation options. The copper and TPH hotspots identified in the remainder of the site are to be remediated through excavation and disposal (Copper) and landfarming (TPH).

3.4.14 Site Design and Management

Issue Summary

Issues of site design and management require Sydney Ports to design the site according to relevant Council or State Government guidelines.

Responses

Chapter 5 of this report outline the requirement to prepare environmental management plans for both construction and site operation.

3.4.15 Drainage and Hydrology

Issue Summary

Strathfield Council and a number of community members indicated concern over the effects of the project on flooding within the Coxs Creek and Cooks River catchment, and issues associated with water quality downstream of the site.

Responses

The ILC site will not provide a solution for existing stormwater problems external to the site, nor will they be studied in any detail. However, the basic principle that the development shall have no external impacts for the accepted ARI events will be applied. Flooding issues would be considered during preparation of hydrological and drainage plans as part of the detailed design phase.

Stormwater runoff management has been satisfactorily discussed in the EA. It will be addressed in detail during the detailed design phase. It should be noted that a detention basin would be constructed at the southern end of the site, immediately north of Coxs Creek. This would also be used to treat run off prior to discharge. The detention basin would be designed to ensure post development peak flows do not exceed pre-development peak flows. The performance of the basin system will be maintained by SPC.

Stormwater, runoff and management were addressed in the EA in Chapter 10. More detailed studies will be undertaken as part of the detailed design.

3.4.16 Heritage and Archaeology

Issues Summary

The Strathfield District Historical Society, Strathfield Council and the Heritage Office provided substantial submissions on heritage issues. Other comments were also received from community members. In its submission, Council indicated:

- The former Enfield Marshalling Yards site as a whole is of heritage significance in illustrating the history and former use of the site and a comprehensive development history and historical survey of the site is required before further demolition or relocation occurs;
- The surviving significant historic built elements which contribute to the historic legibility of the site should be preserved on site. For example, the Administration Building and Yard Masters Office should be retained and utilised as part of the site operations and the pillar water tank, gantry crane and pedestrian footbridge should be relocated to contextually appropriate locations within the site;
- The Tarpaulin factory is not well regarded by the nearby residents. It is feasible to relocate one or both sections of the former Tarpaulin Factory without substantial loss of significance, particularly as it is a reassembled building.

The Strathfield District Historical Society requested the retention and reuse of the Administration Building, the Yard Master's Office and Tarpaulin Factory on site.

The submission by the Heritage Office indicated:

- The Applicant should be asked to provide more information about the conservation and adaptive reuse of the two items of State significance (Tarpaulin Factory and Pillar Tank) on site, in particular the Tarpaulin Factory;
- The items of Local significance- namely the Pedestrian footbridge and Wagon Repair Shed should be ideally retained on site. Their contribution to the significance of the former Marshalling Yards as a whole should be taken into consideration. In this respect the applicant should be asked to explore alternative options to retain and adaptive reuse of these items within the site. The proposed Community and Ecological Area, for example, may be considered as an alternative location;
- The former Yard Master's Office has been assessed as having low heritage significance in the AHI because it has lost much of its heritage significance through the modifications to the building and removal of its significant elements. Given that this item has lost most of its original details the HO does not object to the demolition of the former Yard Master's Office. However full archival recording of this item or any other heritage item on the site that is to be demolished or relocated should be undertaken in accordance with the NSW HO guidelines. Removal to another site altogether should be considered as a last resort after considering all other options and if their retention on site is not possible because of the operation requirements of the ILC. If relocation of these items to a 'railway heritage organisation' is the only viable option, the applicant should be asked to explore possible locations and undertake necessary procedural steps with the relevant organisations before approval is given to the proposed development;
- The Applicant should be asked to prepare a heritage interpretation plan and strategy for the whole site prior to commencement of works. This should be prepared in consultation with Heritage Office and in accordance with Heritage Office guidelines. The approved interpretation plan shall be imparted at an appropriate location for public appreciation for example at the proposed community and ecological area;
- The report does not assess the impacts of the proposed development on the potential European archaeological relics on the site. The applicant should be asked to investigate the impact of the proposed development on the potential archaeological significance of the site. The assessment should be accompanied by an archaeological research design and appropriate mitigation techniques, and should be ideally undertaken prior to the issue of the consent as the findings of this assessment may result in some recommendations to the proposed design. It is requested that upon the result of these studies appropriate conditions regarding the prevention of the potential archaeological remains and their appropriate management should be included within the conditions of consent should approval be granted.

Response

Reuse or relocation options for the Tarpaulin Factory and Pillar water tank will be further investigated as part of the detailed design phase of the project. The Tarpaulin Factory will be stabilised against further deterioration and, in consultation with the Heritage Office and the community, options for its reuse at its present site will be investigated. Only if on-site reuse is found to be unachievable or unacceptable will consideration be given to its relocation off-site to a railway heritage museum or

demolition. The Pillar water tank will be subject to further work to repair it and choose and area for its relocation on-site. The relocation will be undertaken as early as practicable in the construction program.

Due to the nature of activities to occur on the site reuse of the Yard Master's Office is not possible. The Yard master's office cannot be reused on-site or realistically offered to a railway heritage organisation due to its brick structure. Full archival recording of the Yard Master's Office would be undertaken prior to demolition, according to Heritage Office guidelines. The footbridge is to be reused on site, if possible. Further studies will be undertaken prior to construction commencement, to determine the feasibility and location of this item.

Due to extensive termite damage in the wagon repair shed very few elements are fit for reuse. This will be evaluated and investigations undertaken to determine if some elements of this structure may be able to be reused on site. Reuse opportunities will be incorporated into the design. Reuse of part of the footbridge and elements of the wagon repair shed within the Community and Ecological Area would be considered during the detailed design stage, and relocation work undertaken during the construction phase of the project. If during the detailed design, it is established that reuse of heritage items on site is not an option, then the items would be offered to external heritage organisations.

A heritage interpretation plan and strategy for the entire site will be undertaken by Sydney Ports prior to construction works commencing on site. An archaeological assessment for indigenous and non-indigenous heritage was undertaken by Navin Officer in 2001. The report was referenced by Graham Brooks and Associates (Appendix H to the EA). The indigenous studies in the Navin Officer report were updated for this project, but no changes were warranted for the non-indigenous aspects of the report. This 2001 report will be provided to the Department of Planning.

The Navin Officer report concluded that, "given the picture of massive disturbance across the site, it is unlikely that significant archaeological deposits remain on the site. The only possibility is that some deposit may have been sealed under extant buildings or slab foundations. Even so, it is unlikely that such deposits have the potential to tell us more about this site or the construction of what are relatively well documented buildings". Limited archaeological testing is recommended for the area of the Wagon Repair Shed and the Yard Master's Office, and this will be undertaken.

4. Statement of Commitments

4.1 Introduction

The environmental impacts of the proposal have been assessed in the Environmental Assessment (EA) report and measures to manage those impacts were outlined in the form of a statement of commitments. These mitigation measures, along with any conditions of approval issued by the Minister for Planning, would be incorporated into the detailed design, as well as where appropriate, the preparation of construction and operational Environmental Management Plans (EMPs) and sub-plans for the project.

The following sections provide an updated statement of commitments, incorporating responses to comments from relevant Government agencies, Local Government and the community, as well as responses from the Independent Panel which has provided an assessment of the proposal.

Sydney Ports Corporation proposes to construct and operate the ILC at Enfield as described in Chapter 4 of the Environmental Assessment (EA) report, subject to the modifications described in Section 2.2 of this Preferred Project Report (PPR).

4.2 Construction Environmental Management and Mitigation

Environmental management commitments proposed during the construction phase are shown in **Table 4-1** below. These commitments include the preparation of a construction EMP (CEMP) which would be required prior to any construction activities commencing. The CEMP would detail operating conditions and temporary environmental protection measures to mitigate the impact of construction activities. Other commitments may form part of the terms of contract with the companies or consortium responsible for the project construction, or may be further assessed at the detailed design stage.

Table 4-1: Environmental Management Commitments – Design and Construction

Objective	Action
Environmental Management	
Manage hours of construction work to minimise impacts on the community	Proposed hours of construction are 7.00am – 6.00pm Monday to Saturday, with no work on Sundays or public holidays. SPC will seek to maintain these construction times as specified in the EA. However, an undertaking is provided, and will be written into the Noise Management Plan, that high noise operations will not be undertaken after 1pm on Saturdays. The construction EMP will outline protocols for notifying relevant authorities and local residents prior to any works occurring out of normal construction hours. Out of hours work will be required under certain circumstances e.g. to minimise impacts on active operational services (e.g. connection to live sewer, water and electrical services), to minimise impacts on existing traffic, to respond to emergencies, and unavoidable construction constraints (e.g. long concrete pours, overhead rail bridge construction).
Minimise impacts of ILC construction on amenity in surrounding areas	A Construction Environmental Management Plan (CEMP) would be prepared and implemented to guide construction activities as outlined below in the following areas: ■ Road Traffic & Transport ■ Air Quality ■ Works on RailCorp land ■ Soils & Contamination ■ Hydrology & Water Quality

Objective	Action
	■ Noise & Vibration ■ Heritage ■ Flora & Fauna ■ Landscape & Visual ■ Waste Management ■ Energy and Water ■ Consultation. All plans and strategies would be developed as part of the CEMP, in consultation with the relevant agencies.
Road Traffic and Transport	
Minimise impact of ILC construction traffic on surrounding road network	A Construction Traffic Management Plan (CTMP) will be prepared and implemented to: ■ Restrict heavy construction traffic to designated arterial routes using the mechanism of construction contracts; ■ Establish consultation procedures through the Traffic Working Group with the RTA and local councils for any proposed off site works.
Air Quality	
Minimise dust generation during construction	Develop and implement a Dust Management Plan (DMP) as part of the Construction EMP. The DMP would include the following mitigation measures and controls which were incorporated into the air quality modelling: ■ Undertake a dust monitoring program prior to commencement of earthworks and during construction works; ■ Undertake regular watering of active work areas, including stockpiles and loads of soil being transported, to reduce wind blown dust emissions; ■ Haulage trucks to use the sealed haul roads when transporting materials on and off site; ■ Construct wind breaks in appropriate zones to reduce wind erosion; ■ Minimise the area of disturbed / exposed land at any one time; ■ Establish real time dust monitoring sites at two locations on the site. These will operate for the duration of the construction program; ■ Assess construction works activity and modify as appropriate if real-time dust monitoring data indicates ambient air quality criteria are likely to be exceeded due to project earthworks activity; ■ Revegetate stockpiles or progressively landscape exposed areas and where material is to remain in situ for a long period of time. The DMP would include details of a dust-level monitoring program undertaken prior to the commencement of earthworks to establish a background level and during construction works. In addition, monitoring at sensitive receivers would be undertaken during construction on a daily basis, to determine if earthworks contribute PM_{10} levels over and above the predetermined background levels.
Works on RailCorp lands	
Design and construct works according to RailCorp requirements	The design and construction methods for the northern acoustic wall, road overbridge and other rail infrastructure on RailCorp land will be submitted to RailCorp for its approval. The relocation of RailCorp's electrical, signalling and communications and other utilities infrastructure will be submitted to RailCorp for its approval.
Soils and Contamination	
Remediate contaminated soils	A remediation action plan consistent with relevant statutory and policy requirements is to be prepared and implemented prior to earthworks commencing. The strategy will involve: ■ Land farming of Total Petroleum Hydrocarbon (TPH) contaminated soils and further assessment of risk of off-site TPH mitigation; ■ Removal of asbestos and heavy metal contaminated soils, including

Objective	Action
	contaminated soils in the Community and Ecological Area; ■ Materials to be removed from site by an appropriately licensed waste handler and disposed of to a suitably licensed facility; and ■ Trucks to be appropriately covered to prevent release of materials en route. Contamination risks during site works would be assessed and where there is a risk of contamination exposure or mobilisation, appropriate measures would be taken. Validation testing of final exposed surfaces and remediated areas will be undertaken in accordance with DEC guidelines. Notification will be provided to Council as required under SEPP 55 for remediation works undertaken on the site.
Hydrology and Water Quality	
No increased sedimentation of nearby waterways	A Soil and Water Management Plan (SWMP) will be prepared and implemented to reduce the potential water quality impacts from the site during construction. General measures to control erosion of soil and sedimentation would be implemented prior to construction works. These measures would be prepared in accordance with the principles and practices in *Soils and Construction* (Landcom, 2004) and would be maintained and monitored during the construction phase.
Noise and Vibration	
Minimise construction noise impact on surrounding residences	An Environmental Noise Management Plan (ENMP) would be prepared and implemented prior to the commencement of works to achieve compliance with DEC criteria where reasonable and feasible. This Plan would include: ■ Application of physical noise controls to construction equipment, equipment maintenance and utilising “best practice” technology to achieve low levels of construction noise emissions; ■ Noise compliance monitoring for all major equipment and activities on site; ■ Erection of temporary noise attenuation barriers where necessary and practicable; ■ Construction of noise barriers/acoustic mounds as appropriate for the location and type of construction activities as early as practicable in the program; ■ The planning of noisy activities for parts of the day when they would have the least impact; ■ Communication between the community and the construction management to be provided at the start of the works and maintained during the works. This will include a 24 hour complaints handling system and advice to the community prior to undertaking any out-of-hours work; ■ Investigative monitoring of noise in response to specific complaints.
Heritage	
Management of heritage items	Reuse and relocation options for the Tarpaulin Factory and Pillar water tank will be further investigated. The Tarpaulin Factory will be stabilised against further deterioration and, in consultation with the Heritage Office and the community, options for its reuse at its present site will be investigated. Only if on-site reuse is found to be unachievable or unacceptable will consideration be given to its relocation off-site to a railway heritage museum or demolition. If demolished, the tarpaulin Factory will be archivally recorded. The Pillar water tank will be subject to further work to repair it and choose an area for its relocation on-site. Full archival recording of the Yard Master’s office will be undertaken prior to demolition, according to Heritage Office guidelines.

Objective	Action
Determine the presence of archaeological sites (non indigenous)	Reuse of part of the footbridge and elements of the wagon repair shed within the Community and Ecological Area will be considered and relocation undertaken. If it is established that reuse of these items on site is not an option, then the items will be offered to external heritage organisations. A heritage interpretation plan and strategy for the entire site will be undertaken prior to construction works commencing on site. Prior to relocation or demolition of any structures listed for relocation or demolition, those structures will be appropriately recorded and the recording reports lodged with the Local Studies Collection of Strathfield Public Library. Limited archaeological testing was recommended for the area of the Wagon Repair Shed and the Yard Master's Office. This will be undertaken according to Heritage Office Guidelines during demolition of the structures.
Protection of Indigenous Heritage relics if uncovered	In the unlikely event that artefacts of indigenous heritage significance are uncovered during the course of construction, works in the immediate area would cease, DEC would be notified and expert advice would be sought from an appropriately qualified professional.
Flora and Fauna	
Provide secure habitat for the Green and Golden bell Frog	A Frog Habitat Area is proposed to be constructed as part of the Community and Ecological area at the southern part of the site. The area will be designed by qualified personnel and will comprise ponds, foraging and shelter habitat. Frog movement corridors would also be identified to link the new habitat areas with existing frog habitat areas offsite.
Minimise likelihood of direct impacts to threatened species	During site works existing areas of potential frog habitat would be checked and any frogs found removed prior to works commencing. Frog exclusion fences will be provided during construction in areas where there is potential for frog activity.
Landscape and Visual	
Improve and manage landscaping	A Landscape Management Plan (LMP) will be prepared during detailed design of the project and implemented during and after the construction period. The plan would include: ■ processes for the management of the on-site weeds; ■ detail on the rehabilitation of the site with a program of weed removal and revegetation with native species. Noxious weeds at the ILC site would be identified and be removed in accordance to the criteria under the *Noxious Weeds Act 1993*, and the relevant NSW Department of Primary Industries weed control guidelines; ■ Monitoring of vegetation to ensure it becomes established and to identify any further management requirements. Landscaping to be detailed and carried out in accordance with the concepts in the Landscape Masterplan.
Minimise visual impacts during construction	Landscaping and noise mounds would be installed in the early stages of construction to screen the site to a degree appropriate for the location and type of construction activities being carried out. Revegetation of these areas would be conducted as soon as practicable during the construction phases.
Waste Management	
Minimise waste generated and maximise re-use and recycling. Waste disposal to be undertaken when re-use and recycle is not possible	A Waste Management Plan (WMP) would be prepared and implemented. This would include: ■ Measures to minimise waste including the use of clean excavated material as fill for site levelling and road works, the re-use of excavated material not suitable for construction purposes for noise mounds or landscaping where practicable, and contaminated soils to be remediated and used on site where appropriate; ■ Investigate the use of recycled materials in concrete, roadbase, asphalt and other construction materials; ■ Waste for disposal would be removed by a licensed waste contractor and

Objective	Action
	disposed of at a licensed landfill facility; and ■ Quantities of waste produced/reuse/recycled and location of final disposal to be monitored.
Energy & Water	
Manage energy usage and water consumption	Energy and Water Management Strategies will be developed as part of CEMP. Suitable measures would be identified and implemented during the construction phase. Energy management measures could include: ■ Management and maintenance of equipment; ■ Programming of works; ■ Fuel usage control. Water management measures could include: ■ Reduce consumption; ■ Reuse of water where practicable.
Consultation	
Consultation with community and relevant agencies.	A Consultation Plan would be prepared and implemented. This will include: ■ Establishment of a Community Liaison Committee to deal with construction issues; ■ Establishment and maintenance of phone line/fax/website to provide opportunity for community input; ■ A specific component to involve NESB communities; ■ A complaints handling procedure to address and respond to issues raised by the community, including investigative monitoring of construction traffic and noise in response to specific complaints; ■ Working with the ILC Traffic Working Group to implement Construction Traffic Management Plans. Liaison will occur with the community regarding the future use of Tarpaulin Factory and Community and Ecological Area. Should a viable future use of the Tarpaulin Factory not be determined once investigations have been made, the item shall be recorded and offered for relocation to a railway heritage organisation.

4.3 Operational Environmental Management and Mitigation

Mitigation and other environmental management measures identified in the EA and relevant to the operational phase of the project are summarised in **Table 4-2**. These include the preparation of a site Operational Environmental Management Plan (OEMP) which would be required prior to ILC operations commencing. The OEMP would detail on-going operating conditions and protection measures to mitigate the impact of site operations. Relevant measures would be detailed, as appropriate, in the relevant OEMP to be prepared by site tenants or lessees. Others may form part of the terms of contract with tenants or lessees, or may be further assessed at the detailed design stage.

In addition, tenants / lessees may be required to develop separate OEMPs for activities within leased areas. This would ensure that the environment is adequately protected during site operations and that adverse impacts are avoided or otherwise substantially ameliorated.

The OEMP would be updated as required to reflect any changes in the operation of the site or regulatory requirements.

- **Table 4-2: Environmental Management Measures – Operational**

Objective	Action
Environmental Management	
Minimise impact of ILC operations on surrounding area	An Operational Environmental Management Plan (OEMP) would be prepared and implemented to guide operational activities. It would include: ■ Environmental Management ■ Road Traffic & Transport ■ Air Quality ■ Chemicals storage and handling ■ Hydrology & Water Quality ■ Noise & Vibration ■ Heritage ■ Flora & Fauna ■ Landscape & Visual ■ Waste Management ■ Energy and Greenhouse ■ Water Consumption ■ Emergency Response ■ Rail Operations ■ Community Consultation ■ Environmental Reporting All plans and strategies would be developed in consultation with the relevant agencies. Sydney Ports would undertake a sustainability assessment of the operational aspects of the ILC to determine and develop appropriate strategies to minimise environmental impacts. These would be outlined in the OEMP.
General	The OEMP would provide for regular monitoring and periodic performance reviews of the key performance criteria for noise and traffic established for the operation of the ILC. Reviews will be undertaken when throughput reaches 100,000 TEU, 200,000TEU and at capacity. Noise and traffic performance parameters would be established in the OEMP. The examination and interpretation of results will be undertaken by a suitably qualified professional and any agreed actions implemented within a reasonable timeframe, as defined in the OEMP. Hours of operation are 24 hours per day, 7 days per week for the ILC site, comprising the Intermodal terminal, warehousing and empty container storage yards. Hours of operation for the Light Industrial and Commercial Area are 7:00am – 7.00pm, 7 days per week.
Road Traffic and Transport	
Minimise the impact of ILC operational traffic on the surrounding road network	An operational traffic management plan will be implemented to: ■ Ensure, to the satisfaction of the RTA, that the proportion of ILC heavy vehicles generated by the ILC does not unreasonably impact upon the Cosgrove Road/Hume Highway intersection during morning and afternoon peak periods. That is, prior to commencement of the ILC operations, SPC will provide a manual or technological solution to control the frequency of the ILC articulated and B double trucks during morning and afternoon peak periods; ■ As part of this solution daily log sheets for vehicle identification will be maintained. Advanced queue detector systems will be installed and an internal diversion plan developed to prevent any additional loading on

Objective	Action
	Cosgrove Road (it having reached an assigned unacceptable level at a designated location on that road). Alternatively, another recording arrangement acceptable to the RTA will be implemented. Upgrade works will be provided to the intersection of Roberts Road and Norfolk Road, following detailed design approval by the RTA. That is, prior to construction, the detailed design of the following upgrade works will be provided to the RTA for approval. The works will include: ■ Extending the Roberts Road northbound right turn bay to 150 metres; ■ Providing a southbound slip lane into Norfolk Road. (The slip lane length to be as long as possible); ■ Providing a diamond phasing operation on Norfolk Road to ensure right turn movements can be carried out in a controlled and safe environment; ■ Reconfiguring Norfolk Road east to provide a right turn bay of substantial length. In the new design right turn bays in Norfolk Road should face each other; ■ Provide three lanes for exiting traffic (including right turn bay) from Norfolk Road east by widening the intersection to the north; ■ Widening on Norfolk Road will require median island works on Roberts Road to achieve turning path on entry and exit to and from Norfolk Road; ■ It is noted that the on-street parking on the southern side of the eastern arm of Norfolk Road approaching Roberts Road detrimentally affects the efficiency of the intersection. The queued right turn movement and on-street parking prevent left turn vehicles from accessing the kerbside lane and are required to queue single file with right turning vehicles. In addition to widening the eastern arm of Norfolk Road, parking will be prohibited for a distance of 50 metres. The final design will meet RTA's Traffic Signal Design Standards and Principles. Potential traffic impacts from the ILC operations will be managed by: 1. Developing a site traffic management plan, incorporating a Heavy Vehicle Management Plan which demonstrates support for the newly introduced Compliance and Enforcement legislation, in consultation with the RTA. 2. Introducing Local Area Traffic Management measures to minimise impacts on local amenity through a multi-layered approach, including physical barriers, route restrictions (3 tonne limits) and penalties for transgressions, in consultation with Bankstown Council, Strathfield Council and the RTA.
Air Quality	
Minimise emissions from plant and equipment	Equipment to be maintained to ensure the best environmental performance in terms of air emissions.
Chemicals Storage & Handling	
Minimise risk of future contamination.	Operations to be managed to ensure potentially contaminating materials are stored and handled in an appropriate manner, according to relevant Australian Standards, to minimise future contamination risk to surface water, soils and groundwater. Where applicable the storage and handling will comply with, amongst other things: ■ AS 1940 2004: The Storage and Handling of Flammable and Combustible Liquids; and ■ AS 4452 1987: The Storage and Handling of Toxic Substances.
Minimise risk of on site incidents	The Intermodal Terminal operator will be required to prepare and implement operating procedures for the management of dangerous goods through the terminal. The management plan will address any load /unload procedures /precautions/priorities, storage areas, separation of different classes and in some cases separation from boundaries and other tenants/leased areas,

Objective	Action
	bunding/drainage/spillage containment, times on site, damaged or leaking containers, fire planning (pre-arrival notification, and pick up/removal by road vehicle from site or rail delivery to/from the port). Dangerous goods handling elsewhere on the site (eg. warehousing area) will be the subject of a future application and approval as the need arises.
Hydrology and Water Quality	
Manage potential flood effects	The proposal will result in no significant change in flood levels both upstream and downstream. This will be achieved by construction of detention basins which will reduce the post development peak outflow to a level less than or equal to that in the existing case. Two stormwater detention basins would be incorporated: ■ An approximately 33,450m^3 detention basin at the downstream end of catchment D, located at the southern end of the hardstand area; and ■ An approximately 2,000m^3 detention basin at the downstream end of catchment C, located on the eastern edge of the site. The precise size and location for these basins and whether they would be provided above or below ground would be determined at the detailed design stage. The detailed design of flood mitigation measures will be provided to RailCorp for its comment.
Manage water quality runoff to waterways	The key operational water quality measure and environmental safeguard will be the capture and treatment of the 'first flush' represented by the first 10mm of rainfall runoff. This runoff will be contained within a water quality detention basin that would be located adjacent to the proposed peak flow detention basin at the southern end of the site. In order to manage water quality impacts from the ILC site during the operation of the facility, the following treatment devices are proposed: ■ Stormwater treatment by medium filtration; and ■ Stormwater treatment by separation of sediments, oil and grease. Water quality management devices on site will be monitored and maintained at regular intervals to ensure they are functioning as expected. The on-site drainage system will be designed so that a chemical spill of up to 20,000 litres could be contained within the first flush containment basin.
Noise and Vibration	

Minimise operational noise impact on surrounding residences.	An Environmental Noise Management Plan (ENMP) would be prepared and implemented and would detail methods available to mitigate noise during the operation of the proposal. SPC commits to achieving Project Specific Noise Levels, as outlined in the EA, after the application of all feasible and reasonable mitigation measures. In particular the Plan will include:
	■ Time spent by locomotives idling at the northern end of the site would be reduced as much as possible;
	■ Mobile plant used on-site would be fitted with engine noise-reduction kits and variable reverse alarms or flashing lights;
	■ Treatment or location of fixed mechanical plant;
	■ Restriction of the use of public address systems at night;
	■ Noise barriers will be located at the following places:
	  ■ At the south-eastern boundary of the site within the vicinity of Cosgrove Road;
	  ■ At the north-western boundary of the site within the vicinity of Roberts Road; and
	  ■ Along Cosgrove Road behind the Commercial and Industrial area.
	The final height and length of the barriers would be determined during the detailed design stage of the development.
	If required further mitigation measures will be incorporated into the EMP

Objective	Action
Contribute to the management of rail noise in the existing freight corridor between Port Botany and Enfield.	following detailed design and assessment. These would include location of container stacking, construction of partial enclosures over noise generating areas and strategic placement of buildings on site to provide shielding. Other management measures would include: ■ Investigative monitoring of noise in response to specific complaints; ■ Appropriate complaints procedures and means of responding to complaints; ■ Training and educational programs for employees; ■ Review of night operations where any actions would not affect the feasibility of the site's operation; ■ Monitoring of noise levels on site to determine actual noise levels compared with PSNLs to address specific issues; and ■ Incorporation of all reasonable and feasible physical and management measures into the final EMP for the operation of the site. SPC will participate in any interagency working group established to address rail noise impacts along the dedicated rail freight line corridor.
Heritage	
Maintenance of items on site	Heritage items retained on site will be maintained according to the requirements of the NSW *Heritage Act, 1977*.
Flora and Fauna	
Maintenance of Frog Habitat Area	The Frog Habitat Area will be constructed according to the detailed design prepared, and would be managed according to an appropriate Frog Management Plan. Monitoring of the Frog Habitat Area will be undertaken to ensure it is functioning as designed.
Landscape and Visual	
Minimise impacts on residential amenity	Light fittings will be positioned downwards and screen planting will be strategically placed to minimise the chances of spill onto surrounding residences. Lighting on site will be designed to meet AS4282 Control of Obtrusive Effects of Outdoor Lighting. Consultation will be undertaken with rail corridor owners regarding their lighting requirements to ensure proposed lighting on site does not significantly affect adjacent rail operations.
Enhance community facility	Explore opportunities with local community groups for involvement of the community in managed access to the ecological and community area.
Waste Management	
Reduce the generation of waste	Ensure that initiatives for the sustainable management of waste are given due consideration. Such measures would include reduction of materials being brought onto the site, reuse of wastes where practicable and recycling. These measures would be developed as a result of undertaking the sustainability assessment during the detailed design phase of the project.
Energy & Greenhouse	
Reduce energy consumption and greenhouse gas generation	Opportunities to minimise energy consumption on site will be identified and implemented. Energy management measures would be assessed during detail design and would be consistent, as far as practicable, with Strathfield Council's DCP No 27 – Industrial Development. These measures would be developed as a result of undertaking the sustainability assessment during the detailed design phase of the project.

Objective	Action
Water Consumption	
Reduce consumption of water	Identify opportunities to minimise water consumption on site and potential re-use of rain water for toilet flushing, washdown bays and top up of frog ponds. These measures would be developed as a result of undertaking the sustainability assessment during the detailed design phase of the project.
Emergency Response	
Ensure emergency response procedures are adequate	An Emergency Response and Incident Management Plan (ERIMP) would be prepared to ensure incidents are handled promptly and safely. The ERIMP would outline the appropriate emergency response equipment that would be provided, the mandatory training requirements, the emergency response procedure and the responsibilities of site operators.
Rail Operations	
Ensure safe rail operations on site	The ILC's rail infrastructure and rail operations on site will be designed and implemented with systems and procedures in place to comply with statutory requirements for rail access and operational safety.
Consultation	
Effective consultation with the community	▪ Establishment of a Community Liaison Committee to deal with operational issues; ▪ Maintenance of phone line/fax/website to provide opportunity for community input; ▪ A complaints handling procedure to address and respond to issues raised by the community, including investigative monitoring of traffic and noise in response to specific complaints; ▪ Working with the ILC Traffic Working Group to implement Local Traffic Management Plans.
Environmental Reporting	
Provide clear and appropriate communication about site operations	During operation, environmental performance and progress will be incorporated as necessary into the respective corporate environmental reporting of Sydney Ports and the site operators. The reports would ensure relevant authorities have access to important environmental information relating to the new facility. Any shortcomings in environmental performance identified by the reporting process would be addressed by updating the EMPs.

Appendix A Community Responses

Issue Category	Comments	Response	Stakeholder ID	Name
Air Quality	The building of the ILC is substantial and will result in a large increase in semi trailer truck movements in the Enfield area. Since the Enfield and surrounding areas are predominantly residential, this will result in a number of detrimental effects including air pollution.	Traffic generation during operation is addressed in EA Report Chapter 7. The air quality assessment provided in EA Report Chapter 12 identifies that the incremental increase in emissions from trucks in the adjacent roads would not result in exceedance of air quality guidelines.	631	**Submission No 42**
Air Quality	I already receive my fair share of dust, dirt and filth every single day from the industrial surrounds as well as from the traffic and from building sites going up on every spare patch of land. No more dirt and filth thanks.	The potential for increase in dust during construction and operation is addressed in Chapter 12. This assessment shows that the expected PM10 (24 hour average and all hours average) are within NSW EPA air quality criteria. A Dust Management Plan would be implemented during construction, no significant air quality impacts are expected from dust deposition, with dust mitigation measures in place. An Operational Environmental Management Plan would provide a program for ongoing management of traffic and air quality.	585	**Submission No 3**
Air Quality	We are already subject to a lot of smell	There is no potential for increased odours from the proposal. The potential for air quality impacts during construction and operation are addressed in Chapter 12.	706	**Submission No 77**
Air Quality	These operations will result in increased airborne pollution	The air quality assessment provided in Chapter 12 identifies that the incremental increase in emissions would not result in exceedance of the NSW EPA air quality objectives. An Operational Environmental Management Plan would provide a program for ongoing management of traffic and air quality.	686	**Submission No 73**
Air Quality	At Potts Hill Sydney Water has two reservoirs two puffs of wind away from the proposed site.	The air quality assessment provided in Chapter 12 identifies that the incremental increase in emissions would not result in exceedance of the NSW EPA air quality objectives. An Operational Environmental Management Plan would provide a program for ongoing management of traffic and air quality.	649	**Submission No 65**
Air Quality	I have two young children who suffersfrom asthma and associated allergies, this extra pollution accumulate in the air will generally affect their health and the health of other neighbours who live in this area.	The potential for air quality impacts during construction and operation are addressed in Chapter 12. The potential for impacts of air quality on health are also considered in the socio economic assessment in chapter 17. Air quality will be able to achieve guidelines and there should therefore be no effects on public health. An Operational Environmental Management Plan would provide a program for ongoing management of traffic and air quality.	646	**Submission No 62**
Air Quality	I have two young children who suffer from asthma and associated allergies, this extra pollution accumulate in the air will generally affect their health and the health of other neighbours who live in this area.	The potential for air quality impacts during construction and operation are addressed in Chapter 12. The potential for impacts of air quality on health are also considered in the socio economic assessment in chapter 17. Air quality will be able to achieve guidelines and there should therefore be no effects on public	642	**Submission No 62**

Issue Category	Comments	Response	Stakeholder ID	Name
		health. An Operational Environmental Management Plan would provide a program for ongoing management of traffic and air quality.		
Air Quality	I have two young children who suffers form asthma and associated allergies, this extra pollution accumulate in the air will generally affect their health and the health of other neighbours who live in this area.	The potential for air quality impacts during construction and operation are addressed in Chapter 12. The potential for impacts of air quality on health are also considered in the socio economic assessment in chapter 17. Air quality will be able to achieve guidelines and there should therefore be no effects on public health. An Operational Environmental Management Plan and a Construction Environmental Management Plan would provide a program for ongoing management of traffic and air quality.	620	**Submission No 27 & 306**
Air Quality	I have two young children who suffers from asthma and associated allergies, this extra pollution accumulate in the air will generally affect their health and the health of other neighbours who live in this area.	The potential for air quality impacts during construction and operation are addressed in Chapter 12. The potential for impacts of air quality on health are also considered in the socio economic assessment in chapter 17. Air quality will be able to achieve guidelines and there should therefore be no effects on public health. An Operational Environmental Management Plan and a Construction Environmental Management Plan would provide a program for ongoing management of traffic and air quality.	633	**Submission No 46**
Air Quality	I have two young school going girls. One of them suffers from asthma. She is allergic to dust and fuel exhaust. Because of the excessive traffic, more pollution will accumulate in the air and will generally affect the health of my children and neighbourhood.	The potential for air quality impacts during construction and operation are addressed in Chapter 12. The potential for impacts of air quality on health are also considered in the socio economic assessment in chapter 17. Air quality will be able to achieve guidelines and there should therefore be no effects on public health. An Operational Environmental Management Plan and a Construction Environmental Management Plan would provide a program for ongoing management of traffic and air quality.	800	**Submission No 146**
Air Quality	Enfield and surrounding areas are predominantly residential this will result in a number of detrimental effects including, air pollution.	Air quality impacts of construction and operation of the ILC are addressed in Chapter 12. As with most construction activities, there is the potential for dust and air quality impacts. Modelling of potential air quality at a number of sensitive receptors was undertaken as part of this assessment. The results indicate that no significant air quality impacts are expected from dust deposition, with dust mitigation measures in place or form other pollutants.	786	**Submission No106**
Air Quality	Trains and trucks emissions, dust form the vast number of movements per day	Traffic generation during operation is addressed in Chapter 7 and rail traffic in Chapter 8. The air quality assessment provided in Chapter 12 identifies that the incremental increase in emissions would not result in exceedance of the NSW EPA air quality objectives. An Operational Environmental Management Plan would	512	**Submission No 45**

Issue Category	Comments	Response	Stakeholder ID	Name
		provide a program for ongoing management of traffic and air quality.		
Air Quality	Noise and air pollution and traffic congestion will increase and fifty suburbs all over Sydney will be affected, including suburb in the Canterbury Local Government Area where I live.	Removal of a portion of traffic from the roads has the potential to reduce traffic growth related impacts on a regional basis. Noise, air quality and traffic are addressed in Chapters 11, 12 and 7 of the EA report.	789	**Submission No 113**
Air Quality	I object on the basis that The pollution from trucks going in and out from the terminal every day. The air quality in the affected suburbs will reduce dramatically. The extra dirt grime and dust which would be produced with the extra amount of trucks on the roads affecting residents.	Traffic generation during operation is addressed in Chapter 7. The air quality assessment provided in Chapter 12 identifies that the incremental increase in emissions would not result in exceedance of the NSW EPA air quality objectives.	630	**Submission No 39 & 98**
Air Quality	Just remember this I have had problems already and you must know the EIS has failed to take into account weather conditions. Winds form the North East to Easterly have a huge effect on my house. So noise dust and odours from the ILC will be blown through my front door.	The potential for increase in dust during construction and operation is addressed in Chapter 12. This assessment shows that the expected PM10 (24 hour average and all hours average) are within NSW EPA air quality criteria. During particular wind conditions, the dust from construction will be able to be managed by a “real time” monitoring program and reactive management.	539	Georgopoulos, Mr Peter **Submission No 35**
Air Quality	Roberts Rd is an "EXPRESS" not a road for more trucks that fly past the homes creating dust	Traffic generation during operation is addressed in Chapter 7. The air quality assessment provided in Chapter 12 identifies that the incremental increase in emissions would not result in exceedance of the NSW EPA air quality objectives.	622	**Submission No 31 & 100**
Air Quality	The increased traffic volume will also affect the air quality in local streets. Already I'm seeing the dust and soot falling on my house, not to mention my vegetable garden. If the Sydney Port project is approved and my or my children's health are affected by the increased poor air quality I am prepared to take this matter further.	Traffic impacts are assessed in Chapter 7 of the EA report. Trucks would be prevented from using local roads, enforced through various construction and operation traffic management plans. The potential for increase in dust during construction and operation is addressed in Chapter 12. This assessment shows that the expected PM10 (24 hour average and all hours average) are within NSW EPA air quality criteria. A Dust Management Plan would be implemented during construction, no significant air quality impacts are expected from dust deposition, with dust mitigation measures in place. Potential health impacts from the proposed ILC development are further addressed in Chapter 17.	598	**Submission No 22**

Issue Category	Comments	Response	Stakeholder ID	Name
Air Quality	Diesel trucks are a significant contributor to air pollution and the exhaust emissions are carcinogenic. By locating a freight terminal in this area we are sure to see significant increase in the level of toxins and resulting impacts on the health of local residents. The freight terminal will concentrate truck numbers and movements in our local community resulting in higher air pollution.	Traffic impacts are assessed in Chapter 7, in which modelled future traffic volumes around the site are provided. Air quality impacts are addressed in Chapter 12. This identifies only marginal increases in PM10 and NO2 concentrations from off site vehicle traffic, these are below NSW EPA criteria. Potential health impacts from the proposed ILC development are further addressed in Chapter 17.	596	**Submission No 19**
Air Quality	There will be more pollution. One can smell fumes in the atmosphere when going outside.	Traffic impacts are assessed in Chapter 7, in which modelled future traffic volumes around the site are provided. Air quality impacts are addressed in Chapter 12. This identifies only marginal increases in PM10 and NO2 concentrations from off site vehicle traffic, these are below NSW EPA criteria.	593	**Submission No 16**
Air Quality	The development could cause many hazardous implications such as: odour issues from hazardous pollutants and dust in the atmosphere	Potential health impacts from the proposed ILC development are further addressed in Chapter 17.	810	**Submission No 168**
Air Quality	Polluting emissions from train engines and trucks, is a concern. There is no consideration of air quality impacts. It is our understanding that there are no legislated restrictions on emissions from diesel train engines. This could have a significant health impact for Sydney residents through exposure to the deposition of particulate matter and toxins from these engines that are known be detrimental to the respiratory and cardiovascular health and longevity of residents, especially the very young and the elderly, or those with existing health conditions.	Traffic generation during operation is addressed in Chapter 7 and rail traffic in Chapter 8. The air quality assessment provided in Chapter 12 deals with site construction, operations and trucks. It identifies that the incremental increase in emissions would not result in exceedance of the NSW EPA air quality objectives. An Operational Environmental Management Plan would provide a program for ongoing management of traffic and air quality. Potential health impacts from the proposed ILC development are further addressed in Chapter 17. The appropriate approach to the management of effects from the rail freight line through is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	447	**Submission No 315 & 158**
Air Quality	Heavy traffic conditions have lead to major air pollution in the area.	Traffic impacts are assessed in Chapter 7, in which modelled future traffic volumes around the site are provided. Air quality impacts are addressed in Chapter 12. This identifies only marginal increases in PM10 and NO2 concentrations from off site vehicle traffic, these are below NSW EPA criteria.	829	**Submission No 245**

Issue Category	Comments	Response	Stakeholder ID	Name
Air Quality	To give but a few examples: with respect to air quality, too much is excluded from the assessment (eg cumulative effects of locomotive fumes) whilst data on far away locations is included for modelling purposes. Reference is made to Strathfield Council's submission with respect to concerns about the credibility/validity of air quality assessment. The EA contends that the highest risk of air quality impacts during the operational phase are likely to occur from road and rail exhaust emissions(v3 p AQA p8) However, in line with the general methodology the EA concludes that the operation of the intermodal terminal, narrowly interpreted on-site impacts, will not add significantly to the existing situation, however poor. Excluding the pollutants from the increase in diesel locomotive movements therefore is symptomatic of the deficiencies in an assessment of suitability of the site. Much of the data used is of dubious relevance to the Enfield site, which has acknowledged unique meteorological condition, (eg data from Lidcombe, Bankstown Airport, Earlwood) Additionally no attempt has been made to collect site specific data although there has been ample time to do so. Several schools are located very close to the site or along the rail line leading to the site eg, Strathfield South High, Belmore Primary, Malek Fayed School. Scant analysis has been made of potential impacts on the health of students! Should this proposal proceed, A baseline at all suspect locations ought to be established before construction/operational phase and monitored thereafter. Strathfield and other neighbouring Councils would be the logical source of this advice. Permanent monitoring of additional sites for air quality — South Strathfield High, Melville Ave, Newton Road west, Pemberton Rd, Arthur Street at Centenary Drive, rear of properties Cave Road, Liverpool Rd near the canal, Wentworth Rd at Drone Street, Blanche St at Cosgrove ,Dean St abutting canal.	Air quality impacts are considered in Chapter 12, section12.10 provides a cumulative assessment. The air quality study was undertaken in accordance with Department of Environment and Conservation (DEC) guidelines Rail issues are addressed in Chapter 8. Traffic impacts are assessed in Chapter 7, in which modelled future traffic volumes around the site are provided. Air quality impacts are addressed in Chapter 12. This identifies only marginal increases in PM10 and NO2 concentrations from off site vehicle traffic, these are below NSW EPA criteria. Potential health impacts from the proposed ILC development are further addressed in Chapter 17. The changes to air quality from the site operation and truck movements will all fall within designated air quality criteria, so there will be no threat to public health from the proposed works. The appropriate approach to the management of effects from the rail freight line through is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. Construction and operation management plans are to be implemented to monitor and control air quality issues resulting from the ILC. Air quality management measures including appropriate monitoring requirements would be incorporated into the Construction Dust Management Plan and the Operation Environmental Management Plan.	817	**Submission No 120 & 181**
Air Quality	The Environmental Assessment claims that the proposed ILC would result in reduction of carbon dioxide emissions within the Sydney basin. However, the increased amount of truck 7< traffic and resultant pollution in Strathfield Municipality and adjacent areas will be substantially increased.	The relative reduction in total road and rail emissions due to the relative reduction in truck numbers was the basis of the statement. This still applies. Traffic impacts are assessed in Chapter 7, in which modelled future traffic volumes around the site are provided. Air quality impacts are addressed in Chapter 12. This identifies only marginal increases in PM10 and NO2 concentrations from off site vehicle traffic, and these are below NSW EPA criteria.	31	**Submission No 136**

Issue Category	Comments	Response	Stakeholder ID	Name
Air Quality	At no time has Sydney Ports addressed community concerns about the increase in emissions and particulate matter produced by diesel locomotives. We understand that there are no emission controls on diesel locomotives and that no studies have been done to establish their contribution to air quality in the Enfield locality or within the Sydney air-shed, or to determine their contribution to greenhouse gas production. In Queensland, the vast majority of rail freight lines are electrified, thus reducing locomotive emissions, but of course, adding to greenhouse gas through the use of coal fired power. Has NSW considered using the idle electric locomotives 'stabled' at Lithgow? It appears that the NSW Government has very limited concerns for the long-term health of Sydney residents. Study after study, both local and international, has reported the on-going health impacts of pollutants from road traffic on the health and longevity of those exposed to heavy traffic, especially from congested roads. The very young, the elderly and unborn foetuses are particularly vulnerable.	Traffic generation during operation is addressed in Chapter 7 and rail traffic in Chapter 8. The air quality assessment provided in Chapter 12 identifies that the incremental increase in emissions would not result in exceedance of the NSW EPA air quality objectives. An Operational Environmental Management Plan would provide a program for ongoing management of traffic and air quality. Removal of a portion of traffic from the roads has the potential to reduce traffic related impacts on a regional basis, as such will influence traffic related carbon dioxide emissions. Potential health impacts from the proposed ILC development are further addressed in Chapter 17.	447	**Submission No 315, 158**
Air Quality	The artist's impression of the renovated tarpaulin factory shows the mountains absent. Don't move those mountains! These mountains were made in the 1992 to hold toxic and carcinogenic substances from previous use as a marshalling area. Moving those mountains will cause the dust to fly around and settle in nearby residential areas. More of the health effects of moving such dust need to be done.	The stockpiles have been subject to contamination testing, the results are detailed in Chapter 9. Contaminated soils will be removed from site or treated on site and reused. Dust from works areas will be controlled through the Dust Management Plan to prevent the release of airborne particulates from these mounds during construction. Potential health impacts from the proposed ILC development are further addressed in Chapter 17	814	**Submission No 135**
Air Quality	However, our limited research has shown that, with a significant increase in both diesel locomotives and diesel trucks, there is bound to be an unacceptable rise in the levels of noise and air pollution for Southern Sydney. There is no mention in the FIAB report of the air pollution associated with old unregulated diesel locomotives and this is an issue of serious concern to NoPE. We accept that a modal shift to freight rail is in principle a sound concept, but in our view freight rail /noise and the air quality impacts of dirty diesel locomotives are very real and substantial issues that must be addressed and resolved before such a shift occurs.	Rail issues are addressed within Chapter 8. The appropriate approach to the management of effects from the rail freight line through is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	30	**Submission No 93**

Issue Category	Comments	Response	Stakeholder ID	Name
Air Quality	Noise pollution, air pollution and traffic congestion will increase and a whole of Sydney will be affected, including suburbs in the Bankstown Local Government Area where I live.	Removal of a portion of traffic from the roads has the potential to reduce traffic related impacts on a regional basis. Noise, air quality and traffic are addressed in Chapters 11, 12 and 7 of the EA report.	811	**Submission No 125**
Air Quality	We also have grave concerns about Air Pollution (carcinogenic diesel emissions in particular) knowing that the local incidence of cancer in a major Health Study is some 25% to 30% above the average for the Sydney Region.	The air quality assessment provided in Chapter 12 identifies that the incremental increase in emissions would not result in exceedance of the NSW EPA air quality objectives. An Operational Environmental Management Plan would provide a program for ongoing management of traffic and air quality. Potential health impacts from the proposed ILC development are further addressed in Chapter 17.	834	**Submission No 319**
Air Quality	Since the Enfield and surrounding areas are predominantly residential, this will result in a number of detrimental effects including, noise pollution, air pollution and a risk to local pedestrians.	The potential for increase in dust during construction and operation is addressed in Chapter 12. This assessment shows that the expected PM10 (24 hour average and all hours average) are within NSW EPA air quality criteria. A part of the air quality assessment modelling of air quality impacts was undertaken at a number of locations around the site. A Dust Management Plan would be implemented during construction. As a result no significant air quality impacts are expected from dust deposition, with dust mitigation measures in place.	809	**Submission No 123**
Air Quality	You can't even imagine how much noise, dust, vibration, pollution will be experienced by us. Even before the actual functioning starts, there will be so much construction traffic that our life would be made hell. I can imagine how much noise, vibration, pollution, dust would be generated by this. Its simply not a viable idea.	The potential for increase in dust during construction and operation is addressed in Chapter 12. This assessment shows that the expected PM10 (24 hour average and all hours average) are within NSW EPA air quality criteria. A part of the air quality assessment modelling of air quality impacts was undertaken at a number of locations around the site. A Dust Management Plan would be implemented during construction. As a result no significant air quality impacts are expected from dust deposition, with dust mitigation measures in place.	542	**Submission No 122**
Air Quality	With 24/7 use residents will be greatly affected by a huge increase in air pollution and fumes from trucks	Traffic impacts are assessed in Chapter 7, in which modelled future traffic volumes around the site are provided. Air quality impacts are addressed in Chapter 12. This identifies only marginal increases in PM10 and NO2 concentrations from off site vehicle traffic, these are below NSW EPA criteria. Construction and operation management plans are to be implemented to monitor and manage potential air quality impacts. Potential health impacts from the proposed ILC	798	**Submission No 174**

Issue Category	Comments	Response	Stakeholder ID	Name
		development are further addressed in Chapter 17.		
Air Quality	Sydney Ports proposal would have severe impact on the health of the residents as well as traffic flow within 10km radius of the site causing traffic jam, noise, air and lighting pollution for nearby residents	Traffic impacts are assessed in Chapter 7, in which modelled future traffic volumes around the site are provided. Potential health impacts from the proposed ILC development are further addressed in Chapter 17.	794	**Submission No 117**
Air Quality	A lot more people not living in the immediate vicinity of the railway or the freight yard terminal will be affected by the diesel fumes of the train engines and by the diesel fumes of the trucks used to transport goods from the ILC to other parts of the metropolitan area.	Traffic impacts are assessed in Chapter 7, in which modelled future traffic volumes around the site are provided. Rail issues are discussed in Chapter 8. The appropriate approach to the management of effects from the rail freight line through is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. Potential health impacts from the proposed ILC development are further addressed in Chapter 17.	793	**Submission No 147**
Air Quality	I may as well take up smoking because the increased petrol and diesel fumes will get to me anyway, not to mention what it will do to children's lungs. There is already a documented high incidence of cancer related illnesses in this area.	Air emissions from construction and site operation will be able to meet DEC criteria, and there should be no effect on public health as a result of the project. Potential health impacts from the proposed ILC development are further addressed in Chapter 17.	87	**Submission No 102**
Air Quality	There was no study of the amount of particulates generated by the constant starting and stopping and idling of small trucks should the logistics centre be build using the current infrastructure. If the study was based on the current road infrastructure - it is under utilizing the full capacity of the land.	Traffic impacts are assessed in Chapter 7, in which modelled future traffic volumes around the site are provided. Air quality impacts are addressed in Chapter 12. This identifies only marginal increases in PM10 and NO2 concentrations from off site vehicle traffic, these are below NSW EPA criteria.	814	**Submission No 135**
Air Quality	The air quality assessment clearly shows higher increases of SO2 and NO in the vicinity of South Strathfield directly as a result of this development. There is a risk of emissions air quality impacts from emissions of hazardous substances within contaminated soils earmarked for remediation earth works. The contaminants are: heavy metals, hydrocarbons and asbestos. The lower lying canal and the topography of the St Anne's precinct will mean that this area will become the repository of fallout from the operation of the intermodal facility. It is	Air emissions from construction and site operation will be able to meet DEC criteria, and there should be no effect on public health as a result of the project. Potential health impacts from the proposed ILC development are further addressed in Chapter 17.	856	**DoP submission number 329**

Issue Category	Comments	Response	Stakeholder ID	Name
	unacceptable that for approximately one third of the year in total , across all seasons this development's noise and fumes will directly impact my parents property and lifestyle with the consequence of reducing their residential amenity. Both during construction and in operation, the contour maps accompanying the Assessment of Air Quality show that due to topography and prevailing winds, pollution in the vicinity of our house is guaranteed. The engines of the container locomotives are diesel not electric, they therefore create greenhouse gases and contribute to smog.			

Issue Category	Comments	Response	Stakeholder ID	Name
Alternative Sites	NoPE has prepared various submissions arguing strongly that the Enfield site was not appropriate for an intermodal terminal/logistics centre	Alternative sites are considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line.	30	**Submission No 93**
Alternative Sites	If designated containers could be off railed at several different transfer stations e.g. Villawood,Yennora,Ingleburn and Minto the traffic blockage around Enfield would be minimised. Roberts Rd and Cosgrove Rd which has always been a traffic hazard, would then be less impacted.	Chapter 3 provided a detailed justification of the need for an intermodal at Enfield. The site meets the requirements of being within the catchment area it serves, close to rail and close to main road network. The traffic effects at Enfield due to the ILC will be very minor in the context of the existing and future traffic conditions without the ILC.	597	**Submission No 21**
Alternative Sites	Surely it would be more economical and environmentally sound to place such a logistics centre in an Industrial area close to the SPC itself and then have traffic diffuse itself throughout the many areas of Sydney. In this way the area in Enfield might be left for more appropriate usage, as for example, that suggested by the local council, an employment zone.	This is what currently happens. The purpose of the ILC is to reduce the growth in the number of these truck movements diffusing through the streets of Sydney. The ILC at Enfield is needed to provide a base to service the freight container destinations in the inner and middle western Sydney.	626	**Submission No 36**
Alternative Sites	Build the ILC somewhere else where it won't affect the health and quality of life of people.	Alternative sites are considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line.	630	**Submission No 39 & 98**
Alternative Sites	To reduce the environmental impact, the NoPE group have suggested alternatives to the ILC such as updating Port Botany and increasing freight trade at existing ports in Port Kembla and Newcastle. This appears to make a lot more sense than to increase freight transport in an area that is unable to sustain it.	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. If container trade were to expand in Newcastle or Port Kembla to accommodate the growth in container trade within Sydney, containers would still need to travel by train or truck into the inner and middle western areas of Sydney to serve this market catchment area.	631	**Submission No 42**
Alternative Sites	I'm baffled as to why would anyone want to build such a large noise producing facility in the middle of suburbia. Why can't containers be dispatched directly onto trucks from Port Botany which is currently an industrial area.	Alternatives have been considered in Chapter 3 of the EA Report. This is what currently happens. The purpose of the ILC is reduce the growth in the number of these truck movements diffusing through the streets of Sydney. The ILC at Enfield is needed to provide a base to service the freight container destinations in the inner and middle western Sydney.	638	**Submission No 61**
Alternative Sites	There are viable alternatives to the and from the Enfield site	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line.	107	**Submission No 68**

Issue Category	Comments	Response	Stakeholder ID	Name
Alternative Sites	I understand that Wollongong and Newcastle have their arms wide open for the development to occur there. There are viable alternatives to and for the Enfield Site. I urge you to act and alter the proposal for the Enfield site that has the potential to destroy the quality of life of the residents living in Inner West Sydney.	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. If container trade were to expand in Newcastle or Port Kembla to accommodate the growth in container trade within Sydney, containers would still need to travel by train or truck into the inner and middle western areas of Sydney to serve this market catchment area.	681	**Submission No 94**
Alternative Sites	Sydney Ports Corporation reports that the trucks will serve the area west of Enfield. In this case the transfer station could be located further west. The Port Enfield proposal results from NSW plans for the expansion of Port Botany. This expansion will add considerably to train and truck movements.	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line.	686	**Submission No 73**
Alternative Sites	There are viable alternatives to and for the Enfield site.	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line.	713	**Submission No 138,40, 143,119**
Alternative Sites	The proposed site may be ideal but the whole scheme is too close to the metropolitan area. It is my opinion and most other folks too that it would be put to perfection in further out areas. The train line can be used as is less expensive than all the uncalled for problems in using Project 05 0147	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. Other sites further west and south west may also be developed in the future to service those catchment areas as indicated in the Metropolitan Strategy.	586	**Submission No4**
Alternative Sites	We recognise that the proposed Enfield Intermodal Logistics Centre is but one part of a wider plan to create an intermodal terminal network However we do not agree that Enfield is a suitable site for the scale of development that is proposed here.	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed.	30	**Submission No 93**
Alternative Sites	There appears to be very little sense in locating an Intermodal Logistics Centre in Enfield some 18km from Port Botany, The economic viability of double handling and transporting the containers for such a short distance is questionable. It would appear to make more sense to	Alternatives have been considered in Chapter 3 of the EA Report. Details regarding proposed operation of the ILC are provided in Chapter 4. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the	838	**Submission No 173,150**

Issue Category	Comments	Response	Stakeholder ID	Name
	establish a facility further to the west of Sydney where there is better access to the Sydney Orbital road network and to utilise green field sites located away from residential areas.	Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. Other sites further west and south west may also be developed in the future to service those catchment areas as indicated in the Metropolitan Strategy. The environmental assessment has demonstrated that impacts on the local community will be able to be managed.		
Alternative Sites	We believe the location of the proposed Centre is extremely inappropriate. This is a major concern as we know our Property's price value will dramatically decrease due to increased traffic and noise.	Alternatives have been considered in Chapter 3 of the EA Report. This provides details of the required characteristics required for an intermodal facility. Further assessment of socio economic impacts is provided in Chapter 17. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed.	792	**Submission No 116**
Alternative Sites	There are viable alternatives to and from the Enfield site. I urge you to act and end the proposal for the Enfield site that has the potential to destroy the quality of life of residents living in Inner West Sydney	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed.	794	**Submission No 68**
Alternative Sites	Relocate the proposed overdevelopment to the abandoned Badgery's Creek airport site by linking a rail line from the main wester line e.g St Mary's to the Southern line anywhere between Campbelltown and Liverpool- possible Ingleburn.\Great jobs in Sydney's west and where trucks will be loaded to go west anywhere.	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed. Other sites further west and south west may also be developed in the future to service those catchment areas as indicated in the Metropolitan Strategy.	798	**Submission No 174**

Issue Category	Comments	Response	Stakeholder ID	Name
Alternative Sites	It would appear to make more sense to establish a facility further to the west of Sydney where there is better access to the Sydney Orbital road network, rather than basing arguments for the project on "geographic distance from Botany and markets in isolation.	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed. Other sites further west and south west may also be developed in the future to service those catchment areas as indicated in the Metropolitan Strategy.	801	**Submission No 149,183**
Alternative Sites	If you want a larger one-off benefit to the state, it's to privatise the land into smaller blocks and build factories and light industrial units. This will be of greater benefit not only to the state because of the one-off selling of the land, but also generate a recurrent benefit to the local economy, the state's economy and national economy. Privatising and subdividing the land into factories and light industrial areas, goods and services will add to Received the national balance of payments - this is because more jobs will be created than the current proposed facility, goods and services will be produced adding to the national accounts will be produced. On a national economic point of view, the proposed facility given the lack of infrastructure will only encourage the importing of goods which will only decrease the balance of payments. The Greater West Economic Development Board chairman (ABC Asia Pacific, April 2004) was crying out for an intermodal facility such as the one in Enfield. He said there was plenty of land and plenty of infrastructure. Something that is not available for the Enfield site. He also said that the area was now the centre of Sydney. Given access to the M7 (2005) and M4, this would be more sense to use the larger infrastructure facility. More simulation studies need to be done in this matter.	Justification for use of the Enfield site is provided in Chapter 22. Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed. Other sites further west and south west may also be developed in the future to service those catchment areas as indicated in the Metropolitan Strategy.	814	**Submission No 135**
Alternative Sites	I can't see why the Port Botany Depot can't be expanded so that goods going to various areas go there without going to Enfield	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed. Expanding Port Botany does not in itself achieve the State Government's objective of increasing the use of rail to distribute freight across NSW/Sydney. Other sites further west and south west may also be	831	**Submission No 316**

Issue Category	Comments	Response	Stakeholder ID	Name
		developed in the future to service those catchment areas as indicated in the Metropolitan Strategy.		
Alternative Sites	This is not just a case of 'not in my backyard' but a case of 'not in anyone's backyard' and there are many alternatives to locating intermodals and like developments within suburbs which are primarily residential. Developments such as this intermodal must be located in Sydney's hinterland areas and workers will follow to live in nearby unpolluted zones. This is what happened in Newcastle and Wollongong. A wiser alternative would be to locate the intermodal on the outskirts of Sydney where there is still a great deal of vacant land and where government could compulsorily buy back residences which might exist in the path of the development. It should therefore be sited in the first place in a location where a buffer zone can be built and permanently maintained around it to shield commercial and residential zones which may eventually encroach upon it as Sydney expands. A major advantage of siting intermodals at both Newcastle and Wollongong is that if something goes wrong at one intermodal/port ships, trucks and trains can be diverted to the one in working order. This would circumvent the possibility of total stoppage of freight transportation.	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed. Other sites further west and south west may also be developed in the future to service those catchment areas as indicated in the Metropolitan Strategy. If container trade were to expand in Newcastle or Port Kembla to accommodate the growth in container trade within Sydney, containers would still need to travel by train or truck into the inner and middle western areas of Sydney to serve this market catchment area.	736	**Submission No 129,130**
Alternative sites	Rather than spending billions of dollars on freight lines in Sydney and risking the health of residents through increased air pollution, the State Government should consider investing in freight lines in regional areas of NSW. Instead a number of farmers have been inconvenienced.	Government Policy for freight transport is addressed in Chapter 3.	811	**Submission No 125**
Alternative sites	To reduce the environmental impact, The No Port Enfield Community Action Group (NoPE) have suggested alternatives to the ILC, such as, updating Port Botany and increasing freight trade at existing ports in Port Kembla and Newcastle. This appears to make a lot more sense than to increase freight transport in an area that is unable to sustain it. The environmental and social impacts would be sizeable , should the ILC construction go ahead, therefore, this proposal clearly warrants reconsideration.	Consideration of alternative sites is provided in Chapter 3. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed. Other sites further west and south west may also be developed in the future to service those catchment areas as indicated in the Metropolitan Strategy.	786	**Submission No 106**

Issue Category	Comments	Response	Stakeholder ID	Name
		If container trade were to expand in Newcastle or Port Kembla to accommodate the growth in container trade within Sydney, containers would still need to travel by train or truck into the inner and middle western areas of Sydney to serve this market catchment area.		
Alternative sites	The irony is that Port Enfield is all about containers- by their nature their goods and contents are shielded from all weathers and any odours or dust or bugs from exotic climes are encased. Yet, by placing this facility in the heart of Chullora and Strathfield instead of a greenfield site on the perimeter of the city close to a major inter regional route such as the new M7, the NSW Government is addressing precisely every issue other than containment of its adverse consequences	Government policy for freight transport is addressed in EA Report Chapter3. The EA has demonstrated that the impacts of the proposed development on the community will be able to be managed.	856	**DoP submission number 329**
Alternative sites	Alternative sites in areas such as Eastern Creek, close to the M7 and in an area where there is little private residential development and a great deal of commercial activity, would make more sense that the Enfield proposal. Also areas outside of the Sydney basin must be considered, those such as Newcastle or Wollongong where unemployment is higher and those communities would get the much needed economic boost that they currently lack	Alternatives have been considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed. Other sites further west and south west may also be developed in the future to service those catchment areas as indicated in the Metropolitan Strategy. If container trade were to expand in Newcastle or Port Kembla to accommodate the growth in container trade within Sydney, containers would still need to travel by train or truck into the inner and middle western areas of Sydney to serve this market catchment area.	865	**DoP submission No 330**

Submissions General Community: ALTERNATIVE USES OF THE SITE

Issue Category	Comments	Response	Stakeholder ID	Name
alternative uses of site	Underused land on the Enfield site could be developed for other uses such as sports fields or other commercial/industrial uses, not necessarily for container handling and storage.	Justification for using the Enfield site for an Intermodal facility is provided in Chapter 22 of the EA report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line.	447	**DOP Submission No 315, 158**

Submissions General Community: AMENITY/QUALITY of LIFE

Issue Category	Comments	Response	Stakeholder ID	Name
amenity/quality of life	The proposed building of this monstrosity would greatly affect the health and quality of life of people living in the many suburbs that would be affected by it taking in both Strathfield and Bankstown Council Municipalities. Traffic noise and pollution (see in table) will have a detrimental affect on the quality of life and health of the affected residents living near the proposed terminal. The general detrimental environmental affect this proposal will have on the residential areas surrounding this proposed development.	The potential impacts on community amenity were described in detail in Chapter 17 of the EA. The potential for amenity impacts on residents in close proximity to the ILC included noise, air pollution, hazard spills and a number of traffic and pedestrian issues and mitigation measures to address these were described. Further consideration of impacts during construction and operation will be undertaken during detailed design and mitigation and management measures incorporated into the appropriate construction and operational management plans. Noise and air pollution are considered in chapters 11 and 12 of the EA Report SPC is committed to achieving noise and air quality goals during operation. Construction impacts can be managed to achieve a satisfactory level. Light spill was addressed in Chapter 16 and Appendix I of the EA and will be managed by the use of appropriate light fittings and levels. The increased traffic on the surrounding road network due to the proposal was discussed in Chapter 7 and Appendix B of the EA. It will be minimal .Traffic generation form the ILC will result in less than 1% increase in overall traffic in the area. Traffic on the streets surrounding the ILC would be controlled through a Local Area Traffic Management Plan. Road safety will be managed through this process, and the risk of accidents for pedestrians will not change. The ILC is designed for 300,000 TEU by virtue of the site constraints and proposed balanced use of the site between intermodal, warehousing and empty container operations. The appropriate approach to the management of effects from the rail freight line through the area is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	630	**DoP Submission no 39, 98**
amenity/quality of life	The plan is NOT environmentally friendly and once again we are all being squeezed out of our rights for peace and quiet and the right to lead a healthy life by those people who want to make big bucks. We have had enough of it and it is time to stop this inroad into our birthright. What about our children and those that follow on.	See above	585	**DoP Submission no 3**

Issue Category	Comments	Response	Stakeholder ID	Name
amenity/quality of life	I urge you to act and alter the proposal for the Enfield site that has the potential to destroy the quality of life of residents living in Inner Western Sydney	See above	713	**DoP Submission no 138,140,143,119**
amenity/quality of life	I hope you will consider this decisions and think of what's best for people's health and peace of mind for us and our children.	See above	706	**DoP Submission no 77**
amenity/quality of life	It would have disastrous impacts on our community, our environment and our roads. I urge you to act and end the proposal for the Enfield site that has the potential to destroy the quality of life of residents living in Inner West Sydney.	See above	107	**DoP Submission no 68**
amenity/quality of life	I have two young children who suffers form asthma and associated allergies, this extra pollution accumulate in the air will generally affect their health and the health of other neighbours who live in this area.	See above	646	**DoP Submission no 62**
amenity/quality of life	I have two young children who suffers from asthma and associated allergies, this extra pollution accumulate in the air will generally affect their health and the health of other neighbours who live in this area.	See above	642	**DoP Submission no 62**
amenity/quality of life	I have two young children who suffers from asthma and associated allergies, this extra pollution accumulate in the air will generally affect their health and the health of other neighbours who live in this area.	See above	633	**DoP Submission no 46**
amenity/quality of life	Any increase in vehicular captivity generated by the Intermodal will exacerbate these problems and totally destroy any quality of life residents in these areas have left. The only option the Government has in preventing the total destruction of quality of life for residents along the Hume Hwy and Centenary Drive is to pass a law banning trucks form using these roads.	See above	736	**DoP Submission no 129,130**
amenity/quality of life	The increased noise pollution from large trucks will affect the sleeping patterns of local residents. Furthermore, what is being done to compensate local residents for increased noise and air pollution?	See above. Potential noise mitigation measures would be further reviewed during the detailed design phase and included in the operational noise management plan.	631	**DoP Submission no 42**
amenity/quality of life	As I live near the intersection of Juno Pde and Roberts Rd, the noise of brakes and acceleration of trucks is already affecting my health as the noise wakes me up all the time.	See above	571	**DoP Submission no 13,154,170**

Issue Category	Comments	Response	Stakeholder ID	Name
amenity/quality of life	I assure you that health is very important to us all.	See above	622	**DoP Submission no 31,100**
amenity/quality of life	I have two young children who suffers from asthma and associated allergies, this extra pollution accumulate in the air will generally affect their health and the health of other neighbours who live in this area.	See above	620	**DoP Submission no 27,306**
amenity/quality of life	It will hurt my health and other members of my family. It will disturb my sleep and my family from trucks and train.	See above	618	**DoP Submission no 26**
amenity/quality of life	The pollution will affect our health.	See above	93	**DoP Submission no 25**
amenity/quality of life	We feel that our tranquility and quality of life will be compromised.	See above	599	**DoP Submission no 23**
amenity/quality of life	(Referring to air quality) There are many children in this area, also schools, people with asthma cancer and heart problems. It is causing stress at the noise levels now.	See above	593	**DoP Submission no16**
amenity/quality of life	Concern about loss of open space. We do not want our residential suburb to become a commercial port. Imagine the increase in frequency of goods train and hundreds of trucks on the local roads. We do not want our children to grow and suffer in such a noisy and polluted environment.	The proposed ILC is a low density development. Over 8 hectares of the 60 hectare site is green space, including a community and ecological area of 6 hectares. See above	588	**DoP Submission no 7**
amenity/quality of life	Flood lit site (this site can be seen from space with out light what will it be like when fully operation; with hundreds of flood lights beaming on to hard paving and steel rail track) Night time operation- lack of sleep. Customs- how much checking will be taking place? Will this be the next Drug running area of Sydney	The light spill impacts are considered in Chapter 16. The proposed lighting would not be expected to change the night landscape as the lights would be focused downwards and would be part of a landscape already containing a large number of light sources. Lighting on site would be designed to meet AS4282 Control of Obtrusive Effects. Border protection is the responsibility of the Australian Customs Service ('Customs'). It works closely with	512	**DoP Submission no 45**

Issue Category	Comments	Response	Stakeholder ID	Name
	What type of goods will be coming in and what measures will be taken in case of emergency. Explosives, Drugs. My life is in danger.	other government and international agencies, in particular the Australian Quarantine and Inspection Service and the Department of Defence, to detect unlawful movement of goods across the border. Protecting the Australian community through interception of illegal drugs and firearms is a high priority and sophisticated techniques are used to target high-risk aircraft, vessels, cargo and postal items. This includes intelligence analysis, computer based analysis, detector dogs and other technologies. Customs will not treat containers transferred through the ILC any differently to other containers imported into Australia."		
amenity/quality of life	The practicalities of this totally absurd idea of making a container port in the middle of homes can't even be thought about by people sitting in the offices. I live next to the Strathfield South High school, and in your report, no one has given any thoughts for the people living in Cave Road along Hume Highway, all they have thought about is the residents at the other side of Cosgrove Road. I have a family with kids who are studying now. This noise won't make their life easier.	The potential impact of the proposed ILC on health and wellbeing of local residents is reviewed in Chapter 17. Noise is considered in detail in Chapter 11. There will be no noise from the project evident at this location.	542	**DoP Submission no 122**
amenity/quality of life	With regards to the impacts on the communities bounding the proposed site it is suggested that there is nothing in the Environmental Assessment that would persuade me that the amenity and well being will not be severely compromised by this proposal. To suggest that a token environmental area, a few sound barriers and the carrot of jobs growth in what is essentially a residential area will somehow compensate for this loss of amenity is staggering. The EA contends that the ILC will be modelled on typical intermodal activity as at the Port of Melbourne (p46FTWP)—East/West Swanson, Dynon and Kewdale Terminals, Altona, etc. These are all in or near seaports and in heavily industrialized areas. Conditions and siting are in no respects similar to Enfield. 24/7 hours of operation are totally unsuitable for an industrial site adjacent to surrounding residential areas, and move well beyond accepted community standards, expectations and normal planning parameters which have been continually upheld by the Land and Environment Court. Nightime heavy vehicle movements are of concern. Even taking the EA figures which are contestable residents could expect between 50 and 70 truck movements between 10pm and 6pm, that is between 6.25 truck movements and	The potential impact of the proposed ILC on health, amenity and wellbeing of local residents is reviewed in Chapter 17. Opinion noted The ILC activity profile was drawn from these areas. It is not intended that any parallels be drawn, other than that. The assessment has considered night time operation of the site and of truck movement and will be able to manage noise impacts at that time. Truck movements on Roberts Rd, at night, as a result of the development will be minor in the context of the existing and future (without the ILC) noise levels on those roads. Road traffic noise is addressed in Chapter	817	**DoP Submission no 120,181**

Issue Category	Comments	Response	Stakeholder ID	Name
	8.75 truck movements per hour, equivalent to one every 9.6 minutes or one every 6.85 minutes. Considering the noise that deceleration and use of airbrakes currently make at night especially when travelling on the Roberts Rd overpass, this is unacceptable. It is contended that operating hours should be restricted to 5am to 1am the following morning with no deliveries inward/outwards during the period lam -5am. The EA suggests that the EILC should operate using best practice. Should that be the case it is suggested that this ought also to be applied to design of the industrial buildings and storage areas. From a description of the visual character of the proposal (vl p16-3) empty containers are to be stacked 6 high. This is too high at approx 16m as illustrated in nearby Gould Street. This should be conditioned to max 5 high Industrial buildings are planned to be 12m high. Consideration should be given to ensuring that both mounding and additional landscaping and/or painted treatments minimize this bulk. Although not mentioned in the EA, but verifiable by observation the site can clearly be seen from the ridge to the north at Ada Street. This vista needs to be considered. Hours of operation.- hours should be no more than 5am" 1am the following day significantly more than Sydney Airport curfew and than any industrial use adjacent to Residential areas. No deliveries to and from the site should be permitted after 1am and before 5am.	12 of the EA The ILC would operate 24 hours 7 days a week. Visual impacts including design of buildings, landscaping and screening vegetation would be considered during detailed design. The ILC would operate 24 hours 7 days a week.		
amenity/quality of life	The proposed 60 hectare facility will operate 7 days a week, 24 hours a day. As a local resident and a shift worker, I believe that the impacts of this facility will be detrimental on all local residents. Enfield is bounded by the residential suburbs of Strathfield, South Strathfield, Belmore, Lakemba, Belfield, Belmore Greenacre and Chullora.	The potential impact of the proposed ILC on health, amenity and wellbeing of local residents is reviewed in Chapter 17. See details above.	813	**DoP Submission no 176**
amenity/quality of life	I urge the State Government to reconsider this infrastructure development proposal. I do not want an Inter-modal Logistics Centre in Enfield or the resulting damage to the environment and increase in pollution, traffic congestion and the consequent effect on the health of residents.	Opinion noted The potential impact of the proposed ILC on health and wellbeing of local residents is reviewed in Chapter 17.	811	**DoP Submission no 125**
amenity/quality of life	The development could cause many hazardous implications such as: health issues stress amongst residents and other medical problems. This development, if approved would heavily impact on the surrounding residential areas and its communities.	The potential impact of the proposed ILC on health, amenity and wellbeing of local residents is reviewed in Chapter 17.	810	**DoP Submission no 168**

Issue Category	Comments	Response	Stakeholder ID	Name
amenity/quality of life	The increase in truck traffic will impact on a resident's quality of life as there would be a constant rumble of trucks- at all hours of the day and night. Not only are Boronia Rd residents affected by the additional noise factors and quality of life, residents living in cross streets and parallel streets are also affected. Ultimately all residents in Greenacre are affected by the increased noise, increased traffic flow and safety aspects of increased additional container traffic. The aged facility has an entry/exit and parking area located on Boronia Rd between the Hume Hwy and Hillview Rd. there are a number of elderly residents and visitors who use this entry and they would be impacted by the additional traffic. Together with an aged facility located in Chiswick Rd Greenacre, carers and nurses walk aged residents or push wheelchairs or motorised carts around the block and along Boronia Rd. These elderly residents would be affected by the increase in noise and pollution.	The potential impact of the proposed ILC on health and wellbeing of local residents is reviewed in Chapter 17. Further consideration of the potential for noise impacts is provided in Chapter 11 and traffic in Chapter 7. A Local Area Traffic Management Plan would be implemented during operation. Noise and air quality mitigation measures are detailed in chapter 11 and 12.	726	**DoP Submission no 12,178,172**
amenity/quality of life	I am in favour of using rail infrastructure to take trucks off roads- for many reasons. However the cost in lowering the quality of life for people on the route is enormous.	The potential impact of the proposed ILC on health, amenity and wellbeing of local residents is reviewed in Chapter 17.	807	**DoP Submission no 156**
amenity/quality of life	A 24-hour operation will conflict with the night time amenity of the neighbouring residential streets. Night time noise from road and rail, along with light spill from the facility will disturb our local residents and will have negative consequences on their health and well being.	The potential impacts on community amenity were described in detail in Chapter 17 of the EA. The potential for amenity impacts on residents in close proximity to the ILC included noise, air pollution, hazard spills and a number of traffic and pedestrian issues and mitigation measures to address these were described. Further consideration of impacts during construction and operation will be undertaken during detailed design and mitigation and management measures incorporated into the appropriate construction and operational management plans. Noise and air pollution are considered in chapters 11 and 12 of the EA Report SPC is committed to achieving noise and air quality goals during operation. Construction impacts can be managed to achieve a satisfactory level. Light spill was addressed in Chapter 16 and Appendix I of the EA and will be managed by the use of appropriate light fittings and levels. The increased traffic on the surrounding road network due to the proposal was discussed in Chapter 7 and Appendix B of the EA. It will be minimal. Traffic generation from the ILC will result in less than1% increase in overall traffic in the area. Traffic on the streets surrounding the ILC would be controlled through	838	**oP Submission no 150,173**

Issue Category	Comments	Response	Stakeholder ID	Name
	If the Intermodal were approved, Council would prefer to see restricted hours of operation as detailed in Council's submission	a Local Area Traffic Management Plan. Road safety will be managed through this process, and the risk of accidents for pedestrians will not change. The ILC is designed for 300,000 TEU by virtue of the site constraints and proposed balanced use of the site between intermodal, warehousing and empty container operations. The appropriate approach to the management of effects from the rail freight line through the area is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. The ILC would operate 24 hours 7 days a week.		
amenity/quality of life	We are already suffering due to lack of sleep as it is. We do not need even more noisy trains.	The potential impact of the proposed ILC on health and wellbeing of local residents is reviewed in EA Report Chapter 17. Mitigation measures to be implemented to control noise are described in EA ReportChapter 11. The appropriate approach to the management of effects from the rail freight line through the area is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	806	**DoP Submission no 152**
amenity/quality of life	The safety and health problems including stress is not worth this uneconomic venture.	The potential impact of the proposed ILC on health and wellbeing of local residents is reviewed in EA Report Chapter 17.	798	**DoP Submission no 174**
amenity/quality of life	Any use of the Enfield Marshalling Yards as a freight terminal should not be approved. The site is completely unsuitable for such facility given its proximity residential areas and the adverse community and environmental impacts the redevelopment would create. It would have disastrous impacts on our community, our environment and on our roads. There are viable alternatives to and from the Enfield site. I urge you to act and end the proposal for the Enfield site that has the potential to destroy the quality of life of residents living in Inner West Sydney.	The potential impact of the proposed ILC on health, amenity and wellbeing of local residents is reviewed in Chapter 17. Traffic is addressed in Chapter 7. Social impacts are discussed above. Alternative sites are considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the site area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line and to major arterial roads.	794	**DoP Submission no 117**

Issue Category	Comments	Response	Stakeholder ID	Name
amenity/quality of life	The people who will be most affected by the movement of those many smaller trucks will be most affected by the movement of those many smaller trucks ferrying the goods delivered to the ILC by train are those living on Roberts Rd Greenacre and streets that intersect with it. There will be further pressure and stress for residents from noise of freight trains arriving, being unloaded and moving off again.	The potential impact of the proposed ILC on health, amenity and wellbeing of local residents is reviewed in Chapter 17. Traffic is addressed in Chapter 7. Mitigation measures to be implemented to control site operational noise are described in Chapter 11 and in the Preferred Proposal Report (PPR).	793	**DoP Submission no 147**
amenity/quality of life	Our children need to study and we need to get a good night's sleep to be able to function in our daily lives and jobs. When do the residents of Belfield get some peace and quiet? If this proposal goes ahead, rail traffic will undoubtedly increase significantly. There are two schools - Belmore North Primary and Belmore North Boys High - also affected by the noise from the freight trains and any further increase in rail traffic would be unacceptable.	The potential impact of the proposed ILC on health, amenity and wellbeing of local residents is reviewed in Chapter 17. The appropriate approach to the management of effects from the rail freight line through the area is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. Mitigation measures to be implemented to control site operational noise are described in Chapter 11 and in the Preferred Proposal Report (PPR).	524	**DoP Submission no 110**
amenity/quality of life	As a result, the increased noise pollution from large trucks will affect the sleeping patterns of local residents.	The impact of the ILC on amenity and wellbeing of local residents is considered in Chapter 17. Mitigation measures to be implemented to control site operational noise are described in Chapter 11 and in the Preferred Proposal Report (PPR).	786	**DoP Submission no 106**
amenity/quality of life	The FIAB documents fails absolutely to address the impacts of 24/7 operation of the terminals and their associated infrastructure on local communities.	Noted	30	**DoP Submission no 93**
amenity/quality of life	This is compounded by the fact that the proposed development will be active at all hours of the day. As a result, the increased noise pollution from large trucks will affect the sleeping patterns of local residents. Furthermore, what is being done to compensate local residents for increased noise and air pollution.	The impact of the ILC on amenity and wellbeing of local residents is considered in EA Report, Chapter 17. Mitigation measures to be implemented to control site operational noise are described in Chapter 11 and in the Preferred Proposal Report (PPR).	809	**DoP Submission no 123**
amenity/quality of life	This proposal will not only reduce the monetary value of our home but also our peaceful way of life. It is hard to find a quality place like our suburb to live in so close to the city. This proposal will significantly damage one such place. The entire region will be adversely affected My family and I urge you to stop this development that will destroy the quality of life for residents living in the inner	The impact of the ILC on amenity and wellbeing of local residents is considered in Chapter 17. Mitigation measures to be implemented to control site operational noise are described in Chapter 11 and in the Preferred Proposal Report (PPR).	840	**DoP Submission no 322**

Issue Category	Comments	Response	Stakeholder ID	Name
	western part of Sydney.			
amenity/quality of life	In summary, more capital needs to be injected for infrastructure surrounding the proposed facility. This infrastructure will ensure (1) better utilize the land of the proposed facility (2) improve the economics to transport providers to and from the facility - (a)Less fuel used in idling, starting/stopping of trucks - hence savings (b) Less time idling for truck drivers and/or transport providers - saving time = saving money © Less particulants are generated by the idling starting/stopping of trucks — health effects and also economic effects of residents/workers in surrounding areas - better simulation studies need to be done on these points (1), (2) and (3). It is better to use semis and b-doubles rather than many trucks.	These issues are further discussed in Chapter 17 and Chapter 22. Mitigation measures to manage noise and air are outlined in chapters 11 &12 and discussed in the Preferred Project Report (PPR)	814	**DoP Submission no 135**
amenity/quality of life	The study should have a steering panel comprising local residents and Councillors etc. This should be presented at community forums in affected community areas to inform and involve locals in the development process. If this is not done locals will once again believe that Planning and the NSW Govt are not concerned about local impacts on communities and the health and well being of local communities.	SPC intends to further consult with the community during construction and operation of the ILC. This will be through the formation of Community Liaison Groups as well as other means.	686	**DoP Submission no 73**
amenity/quality of life	By virtue of its 24/7 operation (one train every 7 minutes) the proposal will have a deleterious affect on my parents residential amenity. It is unacceptable that for approximately one third of the year in total , across all seasons this development's noise and fumes will directly impact my parents property and lifestyle with the consequence of reducing their residential amenity. There needs to be a more concerted effort at mitigation measures if such a heavy goods operation is proposed within 200 metres of an established residential area. The sole buffer- the community and ecological area- only serves residences to the south. However, given that noise dust, allergens, carcinogens and noxious gases are freely carried on the air subject to prevailing winds fro 24 hours of every day [Executive Summary p8 states" the majority of these (1160 truck movements) would be between 6am and 5 pm],it is little wonder that the proposed measures are nearly absent. It is hard to imagine what if anything will do the job. Whom is going to compensate my parents for the loss of amenity when it is too noisy to hear each other when outside… when soot and fumes permeate clothes hung daily outside, when my father's incipient asthma is	Mitigation measures to manage noise and air are outlined in chapters 11 &12 and discussed in the Preferred Project Report (PPR). The growth in train movements is not caused by the development of the ILC. Train growth will occur along the corridor irrespective of the project. All local ILC impacts however, have been addressed as part of the proposal	856	**DoP submission number 329**

Issue Category	Comments	Response	Stakeholder ID	Name
	exacerbated by being in his home of 49 years, when sleep patterns are disturbed by intrusive noise and the daily trip to the shops becomes a dice with container trucks.			
amenity/quality of life	If this proposed Intermodal Container Center were to go ahead there would be a dramatic and adverse affect on the local community, some of these are, but not limited to: -increased health risks - more trucks --more traffic congestion -significant increase of road accidents -increased vehicle damage to local residents' vehicles as a result of road damage done by the extra truck movements and the damage that they will do to the existing roads - more trains greater increase in air pollution -more road noise pollution -unnecessary increase in local council rates to cover damage done by these trucks to council controlled roads	The potential impact of the proposed ILC on health, amenity and wellbeing of local residents is reviewed in Chapter 17. The increased traffic on the surrounding road network due to the proposal was discussed in Chapter 7 and Appendix B of the EA. It will be minimal. Traffic generation form the ILC will result in less than a 1% increase in overall traffic in the area. Traffic on the streets surrounding the ILC would be controlled through a Local Area Traffic Management Plan. Road safety will be managed through this process, and the risk of accidents for pedestrians will not change. The growth in train movements is not caused by the development of the ILC. Train growth will occur along the corridor irrespective of the project Mitigation measures to manage noise and air are outlined in chapters 11 &12 and discussed in the Preferred Project Report (PPR). All local ILC impacts however, have been addressed as part of the proposal Noted	865	**DoP submission number 330**

Submissions General Community: COMMUNITY & ECOLOGICAL AREA

Issue Category	Comments	Response	Stakeholder ID	Name
Community and Ecological Area	The only benefit provided by the "Community and Ecological area" is to provide a buffer between terminal operations and the residential area to the south of the site.	Other benefits of the area are: **Green and golden bell frog**: It would provide habitat for the green and golden bell frog and provide linkage to other habitats in the vicinity. **Community uses** The area also has the potential to provide passive recreation facilities and other community facilities within the tarpaulin factory should this be retained on site. SPC intends to further consult with the community to ensure the area meets community needs	447	**DoP Submission no 315,158**
Community and Ecological Area	Community area - As indicated under Heritage issues it is not believed that the community has much regard for the heritage value of the tarpaulin shed- it is seen as an eyesore. The Strathfield Social Plan would suggest that the greatest priority of need lies in the provision of community meeting rooms and child care. Interpretative signage and displays/ outdoor museum concept may be of benefit in explaining the site's railway history and connections. Similarly the Recreation Plan would suggest augmentation of bicycle linkages especially from Greenacre through to Begnell Field would be welcomed.	Noted	817	**DoP Submission no 120,181**

Issue Category	Comments	Response	Stakeholder ID	Name
Consultation Process	As a local resident, I feel that we were not consulted or informed adequately by Sydney Ports Corporation about this proposal. During consultation with local residents, it was obvious that community consultation information detailed in the Environmental Assessment has not been distributed in details. Furthermore, no effort has been made to make the information accessible in different languages. Given the cultural background of our local community and the high population of non-English speaking residents this is of a major concern.	Consultation process **800**,599,621,539,563,788,87,798,838,801,805,806,807,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated web site also provided information about the project, the development process and the way by which the community could have its say. Two community days were held - one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Council briefings were held for Strathfield, Bankstown, Canterbury, Burwood and Marrickville at the beginning of the process and during the exhibition of the EA. Briefings were offered to a number of community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area, by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups ands residents. The newsletters were distributed in March and June 2005 and in January 2006. The exhibition period was decided and controlled by the Department of Planning. It lasted from 9 January to 20 February 2006, taking into account the holiday period, and accordingly was longer than the statutory period required under the Environmental Planning and Assessment Regulation. Sydney Ports will continue to consult with the community during construction and operation of the ILC, should it be approved. It will provide for Community Liaison Groups throughout the construction and operation of the ILC, as part of this continued consultative process. NESB communication **800**,633,642,646,838,801,817 Interpreter facilities were offered and promoted in all communication material. Ads were placed in community language papers- Arabic, Vietnamese & Chinese Interpreter service available and promoted in all communication material	800	**DoP Submission no 146**

Issue Category	Comments	Response	Stakeholder ID	Name
Consultation Process	We feel very strongly about this issue. After reading the EIA we feel less than secure with the public consultation process and the impact of the development. We also disagree with the language used by the consultants to try and soften the impacts when the figures clearly show a negative impact. The language indemnifies the consultants but the public have no recourse after the development has been approved.	Consultation process 800,**599**,621,539,563,788,87,798,838,801,805,806,807,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated web site also provided information about the project, the development process and the way by which the community could have its say. Two community days were held - one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Council briefings were held for Strathfield, Bankstown, Canterbury, Burwood and Marrickville at the beginning of the process and during the exhibition of the EA. Briefings were offered to a number of community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area, by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups ands residents. The newsletters were distributed in March and June 2005 and in January 2006. Advertisements concerning the open days were placed in local papers, including community language papers - Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material. The exhibition period was decided and controlled by the Department of Planning. It lasted from 9 January to 20 February 2006, taking into account the holiday period, and accordingly was longer than the statutory period required under the Environmental Planning and Assessment Regulation. Sydney Ports will continue to consult with the community during construction and operation of the ILC, should it be approved. It will provide for Community Liaison Groups throughout the construction and operation of the ILC, as part of this continued consultative process.	599	**DoP Submission no 23**
Consultation Process	The 20 February 2006 deadline is insufficient for proper consideration of the environmental assessment which went on view during the annual summer holiday period. I believe this deadline needs to be extended by at least another 3 months.	Exhibition time- **621**,30,838,801,817 . The exhibition period was decided and controlled by the Department of Planning. It lasted from 9 January to 20 February 2006, taking into account the holiday period, and accordingly was longer than the statutory	621	**DoP Submission no 29,72**

Issue Category	Comments	Response	Stakeholder ID	Name
		period required under the Environmental Planning and Assessment Regulation.		
Consultation Process	The anti democratic extremist legislation recently introduced by the government in order to ram this development through against the interests of many residents. The lack of adequate community or council consultation prior to the release of the EA during the summer holidays when the community was otherwise engaged. The Government's total ignoring of the Hon Milton Morris OAM, Independent Review, which demonstrated the absolute unsuitability of this type of proposal for this area.	Exhibition time **621**,30,838,801,817 Exhibition period took into account the holiday period. The exhibition period was longer than the statutory period required under the Environmental Planning and Assessment Act. Consultation process 800,599,**621**,539,563,788,87,798,838,801,805,806,807,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of assessment and seek views from residents and groups, a second in February about EA. Council briefings were held- one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups and residents. The newsletters were distributed in March, June 2005 and January 2006. Advertisements concerning the open days were placed in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material.	621	**DoP Submission no 29,72**
Consultation Process	I feel that discussion should be proposed with me before approval as my house is in the firing line.	Consultation process- 800,599,621,**539**,563,788,87,798,838,801,805,806,807,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of	539	**DoP Submission no 35**

Issue Category	Comments	Response	Stakeholder ID	Name
		assessment and seek views from residents and groups, a second in February about EA. Council briefings were held- one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups and residents. The newsletters were distributed in March, June 2005 and January 2006. Advertisements concerning the open days were placed in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material.		
Consultation Process	No effort has been made to make the information accessible in different languages. Given the cultural background of our local community and the high proportion of non - English speaking residents this is of major concern.	NESB communication 800,**633**,642,646,838,801,817 Interpreter facilities were offered and promoted in all communication material. Ads were placed in community language papers- Arabic, Vietnamese & Chinese Interpreter service available and promoted in all communication material	633	**DoP Submission no 46**
Consultation Process	No effort has been made to make the information accessible in different languages. Given the cultural background of our local community and the high proportion of non - English speaking residents this is of major concern.	NESB communication 800,633,**642**,646,838,801,817 Interpreter facilities were offered and promoted in all communication material. Ads were placed in community language papers- Arabic, Vietnamese & Chinese Interpreter service available and promoted in all communication material	642	**DoP Submission no 62**
Consultation Process	No effort has been made to make the information accessible in different languages. Given the cultural background of our local community and the high proportion of non - English speaking residents this is of major concern.	NESB communication 800,633,642,**646**,838,801,817 Interpreter facilities were offered and promoted in all communication material. Ads were placed in community language papers- Arabic, Vietnamese & Chinese Interpreter service available and promoted in all communication material	646	**DoP Submission no 62**
Consultation Process	As a resident of Marrickville and living in close proximity to the Port Botany Freight line I am appalled by the lack of consideration Sydney Ports has shown to those people directly affected by this proposal It is also imperative that Sydney Ports consult with those residents that would be most affected by these proposals, something they have declined to do thus far.	Consultation process 800,599,621,539,**563**,788,87,798,838,801,805,806,807,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information	563	**DoP Submission no 95**

Issue Category	Comments	Response	Stakeholder ID	Name
		about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of assessment and seek views from residents and groups, a second in February about EA. Council briefings were held- one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area by direc mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups and residents. The newsletters were distributed in March, June 2005 and January 2006. Advertisements concerning the open days were placed in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material.		
Consultation Process	We write to formally request an extension of the period of exhibition and comment of ONE MONTH in relation to the Enfield Intermodal Logistics Centre, and for a ONE MONTH extension of the time in which to lodge submissions. We intend to make a submission opposing the current proposal for the Enfield Intermodal Logistics Centre. The following factors have, however, made it necessary to seek an extension of time: • The tactic of commencing the exhibition period over January, traditionally a holiday period, has effectively cut/ the exhibition period to less than half. Sydney Ports Corporation has spent a considerable amount of time and money on preparation of the EA to expect respondents, especially individuals and community groups, to mount a detailed in response in a matterof a few weeks is not acceptable. • The fact that submissions to the Professor Richmond review of the Freight Infrastructure Advisory Board report "Railing Port Botany's Containers" closed last Friday February 10 2006, meant that people concerned with the issues of an Enfield intermodal terminal and freight rail have been subject to the "divide and conquer" tactic. Individuals, groups, and indeed organisations have finite time and resources and to have two or more submissions due at roughly the same time is, in our view, not	Exhibition time 621,**30**,838,801,817 Exhibition period took into account the holiday period. The exhibition period was longer than the statutory period required under the Environmental Planning and Assessment Act. Critical Infrastructure development issues	30	**DoP Submission no 93**

Issue Category	Comments	Response	Stakeholder ID	Name
	acceptable. • Press articles this week indicate that documents obtained by the Greens in relation to the M4 East motorway) may have relevance to the EILC proposal and we require time to examine those documents that have just come to light. • We understand that the Independent Hearing and Assessment Panel has not been finalised and that there is Therefore, no immediate pressing need to have submission in by the 20 February 2006. We ask that you advise us by phone and in writing of your decision as soon as possible, preferably today. Please phone Gary Blaschke on 9759 0997, or email noportenfield@hotmail.com Listing a development as "critical" also does away with the need for any meaningful public consultation or the right of appeal. However, it is the local residents who will bear the brunt of the health impacts associated with the proposed network. And because the FIAB report recommends treating rail upgrades as critical infrastructure, there will be no meaningful community consultation and only a general complaints number to dial.			
Consultation Process	As a resident of Marrickville, living right next to the Port Botany freight-line, I am appalled by the extreme & very arrogant lack of consideration that Sydney Ports! has shown to all residents directly affected by the freight-lines in the proposed Enfield Intermodal Logistics Centre. Sydney Ports ought to consult with all residents who would be adversely affected by its proposals. Sydney Ports has neglected to do so thus far.	Consultation process 800,599,621,539,563,**788**,87,798,838,801,805,806,807,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of assessment and seek views from residents and groups, a second in February about EA. Council briefings were held- one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups and residents. The newsletters were distributed in March, June 2005 and January 2006. Advertisements concerning the open days were placed	788	**DoP Submission no 112**

Issue Category	Comments	Response	Stakeholder ID	Name
		in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material.		
Consultation Process	It is obvious nobody from SPC has any interest in the residents concerns as they noticeably have not read anything submitted to them. As long as you are seen to be so called consulting seems to be all you care about.	Consultation process 800,599,621,539,563,788,**87**,798,838,801,805,806,807,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of assessment and seek views from residents and groups, a second in February about EA. Council briefings were held- one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups and residents. The newsletters were distributed in March, June 2005 and January 2006. Advertisements concerning the open days were placed in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material.	87	**DoP Submission no 102**
Consultation Process	I believe Auburn Council should be included in the consultation process with the RTA and Strathfield and Bankstown Councils regarding trucks using only major roads not residential. Agreement has to be reached before Enfield operations commence, so that at least no more container trailers come down residential streets. This is particularly pertinent to Auburn council if, as stated, the Chullora transfer station for interstate goods is to be grown by 2 or 4 times in the next 20 years Include Auburn Council in consultations re speed and load restrictions on local and residential roads.	SPC invited Auburn council to participate and to have a briefing.	597	**DoP Submission no 21**

Issue Category	Comments	Response	Stakeholder ID	Name
Consultation Process	Residents not properly consulted or given more time to present a more detailed submission.	Consultation process 800,599,621,539,563,788,87,**798**,838,801,805,806,807,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of assessment and seek views from residents and groups, a second in February about EA. Council briefings were held- one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups and residents. The newsletters were distributed in March, June 2005 and January 2006. Advertisements concerning the open days were placed in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material.	798	**DoP Submission no 174**
Consultation Process	Community consultation on the Intermodal proposal has been appalling. The EA details the strong make up of non-English speaking families in our and neighbouring local government areas. At the same time no effort has been made by the Sydney Ports Corporation to make accessible information about the project in languages other than English, As a result the community is uninformed about the proposal. This is further exacerbated by holding the exhibition period over the Christmas break, a time when families are traditionally on holiday.	Consultation process 800,599,621,539,563,788,87,798**,838**,801,805,806,807,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of assessment and seek views from residents and groups, a second in February about EA. Council briefings were held- one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA.	838	**DoP Submission no 173,150**

Issue Category	Comments	Response	Stakeholder ID	Name
		Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups and residents. The newsletters were distributed in March, June 2005 and January 2006. Advertisements concerning the open days were placed in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material. <u>Exhibition time</u> 621,30,**838**,801,817 Exhibition period took into account the holiday period. The exhibition period was longer than the statutory period required under the Environmental Planning and Assessment Act. <u>NESB Communication:</u> 800,633,642,646,**838**,801,817 Interpreter facilities were offered and promoted in all communication material. Ads were placed in community language papers- Arabic, Vietnamese & Chinese Interpreter service available and promoted in all communication material		
Consultation Process	I would also like to express serious concern regarding the level of community consultation. No effort has been made by the Sydney Ports Corporation to make accessible information about the project in languages other than English. This is unacceptable given the high proportion of non-English speaking background residents. Further by holding the exhibition period over the Christmas break, a time when families are traditionally on holiday, it is little wonder that many persons in the community are uninformed about this proposal. This fact could seriously jeopardise acceptance of this facility in our community both during construction and operation into the future.	<u>Consultation process</u> 800,599,621**,539**,563,788,87,798,838,**801**,805,806,807,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of assessment and seek views from residents and groups., a second in February about EA. Council briefings were held- one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre.	801	**DoP Submission no 149,183**

Issue Category	Comments	Response	Stakeholder ID	Name
		Three newsletters were widely distributed in the area by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups and residents. The newsletters were distributed in March, June 2005 and January 2006. Advertisements concerning the open days were placed in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material. Exhibition time 621,30,838,**801**,817 Exhibition period took into account the holiday period. The exhibition period was longer than the statutory period required under the Environmental Planning and Assessment Act. NESB Communication: 800,633,642,646,838,**801**,817 Interpreter facilities were offered and promoted in all communication material. Ads were placed in community language papers- Arabic, Vietnamese & Chinese Interpreter service available and promoted in all communication material		
Consultation Process	Sydney Ports should consult with those residents that would be most affected by these proposals, something they have declined to do thus far.	Consultation process 800,599,621**,**539,563,788,87,798,838,801,**805**,806,807 ,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of assessment and seek views from residents and groups., a second in February about EA. Council briefings were held- one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups and residents. The newsletters were distributed in March, June 2005 and January 2006.	805	**DoP Submission no 124**

Issue Category	Comments	Response	Stakeholder ID	Name
		Advertisements concerning the open days were placed in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material.		
Consultation Process	I am appalled by the lack of consideration Sydney Ports has shown to those people directly affected by this proposal. It is also imperative that Sydney Ports consult with those residents that would be most affected by these proposals, something they have declined to do thus far.	Consultation process 800,599,621,539,563,788,87,798,838,801,805,**806**,807,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of assessment and seek views from residents and groups, a second in February about EA. Council briefings were held- one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups and residents. The newsletters were distributed in March, June 2005 and January 2006. Advertisements concerning the open days were placed in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material.	806	**DoP Submission no 152**
Consultation Process	As a resident of Marrickville and living in close proximity to the Port Botany freight line I am appalled by the lack of consideration Sydney Ports has shown to those people directly affected by this proposal. It is also imperative that Sydney Ports consult with those residents that would be most affected by these proposals, something they have declined to do thus far	Consultation process 800,599,621,539,563,788,87,798,838,801,805,806,**807**,813.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of assessment and seek views from residents and groups, a second in February about EA. Council briefings were held- one in May 2005 to outline	807	**DoP Submission no 156**

Issue Category	Comments	Response	Stakeholder ID	Name
		process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups and residents. The newsletters were distributed in March, June 2005 and January 2006. Advertisements concerning the open days were placed in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material.		
Consultation Process	There has been a lack of consultation which is causing us great concern	Consultation process 800,599,621,539,563,788,87,798,838,801,805,806,807**,813**.831,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of assessment and seek views from residents and groups, a second in February about EA. Council briefings were held- one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups and residents. The newsletters were distributed in March, June 2005 and January 2006. Advertisements concerning the open days were placed in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material.	813	**DoP Submission no 176**

Issue Category	Comments	Response	Stakeholder ID	Name
Consultation Process	Sydney Ports Corporation has made direct contact with community organisations such as the Strathfield District Historical Society in regard to the proposed development at Enfield and though, we are opposed to the development, we are grateful of the opportunity to provide comment.	Positive comment re consultation with Historical Society.	31	**DoP Submission no 136**
Consultation Process	Time for response to Environmental Assessment has been unsatisfactory being too close to Christmas/School holiday period. Acknowledgement of high ethnicity has been made, yet no apparent attempt to communicate in languages other than English. The proponents have arguably relied on high ethnicity to retard both community understanding and, community mobilization of potential objection. Survey of Enfield residents —Anachronistically, Enfield as a suburb is far removed from the site surveying of Residents from Strathfield South (north and south of the highway), Belmore, Greenacre and Belfield ie those most affected would have been more valid. Community consultative Committee with appeal to a statutory body to ensure conditions are \ met and agreements entered into upheld	Exhibition time 621,30,838,801,**817** Exhibition period took into account the holiday period. The exhibition period was longer than the statutory period required under the Environmental Planning and Assessment Act. NESB communication 800,633,642,646,838,801,**817** Interpreter facilities were offered and promoted in all communication material. Ads were placed in community language papers- Arabic, Vietnamese & Chinese Interpreter service available and promoted in all communication Community Consultative committee **817** SPC will continue to consult with the community during construction and operation of the ILC should it be approved. It would consider CLGs as part of this continued consultative process	817	**DoP Submission no 120,181**
Consultation Process	It is also imperative that Sydney Ports consult with those residents that would be most affected by these proposals, something they have declined to do thus far.	Consultation process 800,599,621,539,563,788,87,798,838,801,805,806,807,813.**831**,835,836,837 Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated website also provided information about the project, the development process and the way by which community could have their say. Two community days- one in May to outline process of assessment and seek views from residents and groups, a second in February about EA. Council briefings were held- one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Briefings were offered to community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners,	831	**DoP Submission no 316**

Issue Category	Comments	Response	Stakeholder ID	Name
		community groups and residents. The newsletters were distributed in March, June 2005 and January 2006. Advertisements concerning the open days were placed in local papers, including community language papers – Arabic, Vietnamese and Chinese. Interpreter facilities were offered and promoted in all communication material.		
Consultation Process	Is preparing a submission for the South West Enviro Centre and request an extension of time to complete the submission. Hopefully it will reach (DoP) by end of week 24 February 2006	This has been received	447	**DoP Submission no 315,158**
Consultation Process	Members are concerned there has been inadequate consultation with Bankstown Council regarding the impacts of the proposal.	SPC has had regular communication with Bankstown Council during the development and exhibition of the Environmental Assessment. Council had considerable input into what SPC needed to address during the EA process. SPC held briefings with Council - one in May 2005 to outline the process of assessment and to Council views on the proposed development. A second briefing was held in February 2006 to brief Council on the outcome of the EA, during the exhibition period. SPC has ensured that Council was aware of all activities to involve the community in opportunities to find out more about the project. Council received large numbers of information material such as brochures and newsletters and an exhibition of the proposed development was placed at Council offices. During the exhibition of the EA, a display about the development was placed at Council offices. As a member of the traffic working group set up to discuss local area traffic management Bankstown Council has been kept informed and has had good opportunities to participate in discussion about local traffic issues with SPC, RTA and other local councils that are also members of this committee.	865	**DoP Submission no 330**

Issue Category	Comments	Response	Stakeholder ID	Name
contamination	How will contamination of the proposed frog habitat be avoided?	Drainage and associated pollution prevention devices would be developed during detailed design to prevent contamination of the frog habitat from operations on site.	447	**DoP Submission no 315,158**
	If the aquifers and Mount Enfield are contaminated, what chance will the frogs have?	Further investigations are to be undertaken into the contamination hotspot (As) within the proposed Community and Ecological area to determine the significance and extent of the elevated levels, prior to assessing remediation levels. A risk assessment would be undertaken to determine whether there is a threat to sensitive receptors including the Green and Golden BBell Frog. This information would be used to assess remediation options, if required.		
	Much of the area set aside for 'restricted' recreational access by the community is a contaminated toxic stockpile of material previously cleared from the rest of the site. Known locally as Mount Enfield, it cannot be appropriate to use this site for recreation of any kind.	A Remediation Action Plan is to be prepared and identified contamination to be remediated prior to earthworks commencing. Validation testing of remediated hotspots and all exposed surfaces is to be undertaken to ensure contaminant levels are below threshold levels approved within the RAP.		
	The implication of the words 'restricted access' is not clear. Will Mount Enfield be developed as a mountain bike trail or something similar?	SPC intends to further consult with the community to ensure the area meets community needs		
	Will the green and golden bell frogs survive the toxic leachate emanating from this stockpile?	See above comments		
	What contaminants are in the stockpile? Is this the source of the contaminants in the two aquifers identified by Sydney Ports?	See above comments re stockpile. These would be remediated prior to earthworks commencing. Contamination in the underlying aquifers is unlikely to be related to the stockpiles.		
	What testing for contamination has been done in the Cox's Creek channel? This needs to be done to determine what level of pollution exists now so that any increases can be measured.	Water quality in Coxs Creek is detailed in Chapter 10 and Appendix D.		
contamination	The artist's impression of the renovated tarpaulin factory shows the mountains absent. Don't move those mountains! These mountains were made in the 1992 to hold toxic and carcinogenic substances from previous use as a marshalling area. Moving those mountains will cause the dust to fly around and settle in nearby residential areas. More of the health effects of moving such dust need to be done.	A Remediation Action Plan is to be prepared and identified contamination to be remediated prior to earthworks commencing. Validation testing of remediated hotspots and all exposed surfaces is to be undertaken to ensure contaminant levels are below threshold levels approved within the RAP. Measures included in the Dust Management Plan would be implemented during construction to prevent dust impacts.	814	**DoP Submission no 135**

Issue Category	Comments	Response	Stakeholder ID	Name
contamination	In the redevelopment of Rhodes the government was concerned to see that de-contamination of old industrial sites was done safely so as not to affect the lives of present and future residents. Why are not the residents of Enfield Strathfield Bankstown etc given the same courtesy?	Contamination issues on site and the proposed methodology for management and remediation is provided in EA Report Chapter 9. These will be carried out in accordance with DEC guidelines	736	**DoP Submission no 129,130**
contamination	Movement of large contaminated soil mound being used as fill on site.	A Remediation Action Plan is to be prepared and identified contamination to be remediated prior to earthworks commencing. Soils from beneath removed buildings would be visually inspected and testing undertaken if evidence of contamination is present or if the soils are visually different from the surrounding area. Validation testing of remediated hotspots and all exposed surfaces is to be undertaken to ensure contaminant levels are below threshold levels approved within the RAP. Further investigations are to be undertaken into the contamination hotspot (As) within the proposed Community and Ecological area to determine the significance and extent of the elevated levels prior to assessing remediation options. The copper and TPH hotspots identified in the DELEC area are to be remediated through excavation and disposal and landfarming .	512	**DoP Submission no 45**
contamination	Roberts Rd is an "EXPRESS" not a road for more trucks that fly past the homes creating contamination.	Air quality impacts are addressed in Chapter 12 of the EA Report.	622	**DoP Submission no 31,100**

Issue Category	Comments	Response	Stakeholder ID	Name
Design	We wish to ensure that any development of an ILC is connected by the existing freight line to the Sydney Harbour berths at White bay. The exhibited EA does not appear to deal with this issue. It is important to us,and to the community because White Bay wharves are the sole Harbour wharves capable of rail servicing with exiting infrastructure, and there appear to be no real opportunities for provision of additional rail infrastructure to other wharves. The 'working harbour' concept supports our view. The freight line from White Bay joins the line to Botany bay between Hurlstone Park and Dulwich Hill stations; freight from White Bay would flow to the intermodal Centre in harmony with that from Botany Bay.	Container and general cargo operations moved from White Bay to Darling Harbour in November 2003. There is no current lessee/operator utilising rail transport. However, new maritime uses may in future require rail transport from White Bay.	822	**Submission No 43**

Submissions General Community: ECONOMIC BENEFIT

Issue Category	Comments	Response	Stakeholder ID	Name
Economic benefit	We are mindful of the economical benefit of such a proposal to the State Government and the Port Botany Authority, but the down side can't justify the adverse ramifications to the community	Noted	865	**DoP submission number 330**

Issue Category	Comments	Response	Stakeholder ID	Name
EIS process	The EIS has overlooked this area where my home is located. It also has incorrect information regarding the intersection of Norfolk Rd and Roberts Rd. The EIS should include the area where my home is located as it has a history of problems relating to industry near the proposed ILC.	The intersection has been reviewed and the information provided is appropriate. The potential impacts on all residential areas were addressed.	539	**DoP Submission no 35**
EIS process	The study area in the EA is too narrowly drawn. There will obviously be adverse environmental effects over a much wider area. For instance where my family live in Strathfield we are already assailed daily screeching trains, and idling engines from the freightlines north of the study site; or by compression braking of heavy vehicles on Centenary Drive as they take the overhead bridge at the Hume Highway. There will be substantial visual impacts over a much wider area. [For instance much of Strathfield e.g. south Street, overlooks the ILC site and will have its skyline altered by the large warehouse structures and cranes	The study areas were defined based on the proposed use of the property as an intermodal logistics centre. The growth in train movements is not caused by the development of the ILC. Train growth will occur along the freight rail corridor irrespective of the project. All local ILC impacts however, have been addressed as part of the proposal. The traffic and visual impacts of the development are defined in EA Report chapters 7 and 16 respectively and are considered minor.	856	**DoP submission number 329**

Issue Category	Comments	Response	Stakeholder ID	Name
ESD	Impacts on the dozens of small businesses in the location, is also not canvassed. If ever a proposal required application of the precautionary principle and consideration of intergenerational equity this is one. Ecologically sustainable development - this development is not sustainable given the acknowledged deficiencies of the site with respect to dysfunctionality of the road network and existing issues with respect to external rail and road noise and pollutants The precautionary approach suggests that even although the development itself may be deemed to have low impact (and this is highly contestable) the overall context of the development is negative Intergenerational equity - to approve this development reserves problems of remediation and social cost for future generations Intangible costs - no attempt has been made to cost cumulative impacts of the development in the wider context of the region - costs of accidents, human health opportunity costs in property values, costs to the transport industry of queuing and congestion off site, costs to existing small businesses etc.	Review of the Precautionary Approach and Inter Generational Equity is provided in Section 22.5.1 and 22.5.2 of the EA Report. Traffic, rail, noise and air quality are considered in Chapters 7, 8, 11 and 12 of the EA Report. ESD is considered under Project Justification in Chapter 22. Mitigation and management measures would be implemented through construction and operation to prevent the release of pollutants and manage identified negative impacts. When considering ESD the transport of goods via rail is a more sustainable alternative than transport by road. Remediation of contamination on site and reuse of facilities currently present has ESD benefits. The railway infrastructure to be provided would ensure long term operational benefits for future generations. Cumulative impact assessment for air and noise are provided in Chapters 12 and 11. Safety (accidents), human health, property impacts, traffic and business impacts are considered in Chapters 20, 17 and 7 of the EA Report.	817	**DoP Submission no 120,181**
ESD	Use of the Enfield Marshalling Yards as a freight terminal should only be approved if it is economically viable and environmentally sustainable.	Project need and justification is provided in Chapters 3 and 22 of the EA Report. SPC is willing to invest in the development of the property	713	**DoP Submission no 138,140,143,119**
ESD	As it stands it seems we are importing too many cheap goods that end up after a year or two on the footpaths of local streets for councils to remove. If today there are 28 rail freight movements from Port Botany to Enfield per day and that by 2016, in 10 years time there will be 94 per day- almost a fourfold increase - will that mean Sydney has to dispose of 4 times today's rubbish.	Government policy should address the origin and packaging of imported goods. The ILC would provide a more sustainable means of distributing those imported goods. Waste is a significant issue in all developed countries. The environmental management measures to be implemented on site would ensure that the waste hierarchy (reduce, reuse, recycle) is employed for both construction and operation stages.	597	**DoP Submission no 21**
ESD	It is our contention that rail and road access to Port Botany needs to be improved (part 1 Recommendation 15), but it is imperative that steps be taken to invest in the freight corridor between Newcastle and Sydney and in acquiring land at the port of Newcastle in the immediate future.	Noted	447	**DoP Submission no 315,158**

	It is our strongly held view that freight rail links to Newcastle and its port must be given high priority if NSW is to grow and prosper in the long term. Making Sydney unliveable through a short term 'quick fix' will not achieve this.	Noted.		

Issue Category	Comments	Response	Stakeholder ID	Name
flora and fauna	The proposed location for the Intermodal contains habitat for the Green and Golden Bell- Frog (L/tor/a aurea) a species listed as Endangered under both State and Federal Threatened Species Legislation. The Environmental Assessment states that the Enfield Marshalling Yards contains marginal habitat for Bell frogs. Although true, it is the combination of this and adjacent areas that provide the habitat required for the species. As such it is not appropriate to consider the site in isolation, but rather as a key component of a series of fragmented habitats that when considered together make up the total habitat. The impact of the proposed Intermodal needs to be considered in this context.	It is intended that a foraging habitat for the Green and Golden Bell Frog would be established on the community and ecological area at the southern end of the site. The EA, chapter 13, describes how the ILC foraging habitat area links to existing adjacent areas. This would aim to link to other habitats in adjacent areas and not consider it in isolation.	838	**DoP Submission no 173,150**
flora and fauna	As for the green and golden bell frog and other frogs still living within the environs of the old Enfield marshalling Yards (Now ILC site) put in ponds, create habitats and foraging areas, consider them in the process. Plant trees and native grasses if they will grow on old rail fill and spoil. But most of all don't cause them grief by despoiling and defiling their environment any more.	It is intended that a foraging habitat for the Green and Golden Bell Frog would be established on the community and ecological area at the southern end of the site. The EA, chapter 13, describes how the ILC foraging habitat area links to existing adjacent areas. This would aim to link to other habitats in adjacent areas and not consider it in isolation.	793	**DoP Submission no 147**
flora and fauna	The provision of a habitat for frogs does not impress us at all because we know that frogs will not be able to cope with the pollution created by intermodal activity. It is not just about having a habitat, it is about having an unpolluted healthy habitat.	It is intended that a foraging habitat for the Green and Golden Bell Frog would be established on the community and ecological area at the southern end of the site. SPC would ensure that this is habitat supports and encourages improvement and continued health for frogs. Frog ponds are located away from the intermodla activity and will be fed from clean runoff which may be roof runoff.	736	**DoP Submission no 129,130**
flora and fauna	Disturbance of the green and golden bullfrog ponds which is boarding on extinction	It is intended that a foraging habitat for the Green and Golden Bell Frog would be established on the community and ecological area at the southern end of the site. SPC would ensure that this is a habitat supports and encourages improvement and continued health for the frog.	512	**DoP Submission no 45**
flora and fauna	The report indicates that the "modified environment provides habitat to a number of disturbance tolerant flora and fauna species" Which animals and plants are disturbance tolerant? Furthermore the assessment claims that the "ILC is not considered to affect, threaten or have an adverse impact on any of those plants or animals" How can that be? With all the tractors, bulldozers, trucks soil moved around, cement trucks into the site you can't be serious that plants	There is very little original flora remaining on site, none are threatened or endangered ecological communities. The tolerant species refers primarily to invasive plants a high proportion of which are weed species (including noxious weeds) and exotic grasses and to fauna which is able to survive in these disturbed areas. Further details are provided in Chapter 13. The vegetation to be removed constitutes primarily invasive species (see above). No threatened fauna have been identified on site.	842	**DoP Submission no325**

Issue Category	Comments	Response	Stakeholder ID	Name
	and animals won't be affected.			
flora and fauna	It is good to see that the green and golden bell frog gets a mention with provision for a secure habitat. Will it be large enough to permit some frog migration? It would be wonderful if a system of underground pipes or swales could be organised to protect frogs who may travel under rail lines.	It is intended that a foraging habitat for the Green and Golden Bell Frog would be established on the community and ecological area at the southern end of the site. The EA, chapter 13, describes how the ILC foraging habitat area links to existing adjacent areas. This would aim to link to other habitats in adjacent areas and not consider it in isolation.	597	**DoP Submission no 21**

Issue Category	Comments	Response	Stakeholder ID	Name
Heritage/Archaeology	The Enfield Marshalling Yards has important heritage significance and it is disappointing that this site will be so dramatically altered in future, with little reference to its past and importance in the local community.	A detailed heritage study of the site was undertaken, details are provided in Chapter 15 and Appendix H.	31	**DoP Submission no 136**
	According to Project Newsletter Issue 3 January 2006, Sydney Ports intends to make this a gift to the community. If Sydney Ports intends to 'gift' these to the community, Sydney Ports should finance restoration, maintenance and determine a genuine use for these sheds. If a viable and sustainable use can not be determined, the sheds should be moved and reassembled to another site. The burden of restoration and maintenance should not fall to the community and local Council, when this is the clear responsibility of the current owners.	Reuse options for the Tarpaulin Factory will be further investigated as part of the detailed design phase of the project. The Tarpaulin Factory will be stabilised against further deterioration and, in consultation with the Heritage Office and the community, options for its reuse at its present site will be investigated. Only if on-site reuse is found to be unachievable will consideration be given to its relocation off-site to a railway heritage museum or demolition.		
	In reference to the heritage assessment, the Strathfield District Historical Society does not agree with some of the recommendations of the report in particular.	NOted		
	The Administration Building, built c. 1940s appears to be in good condition. This style of building is rare in Strathfield Municipality, which has few historic industrial buildings in existence. The former Ford Factory on Parramatta Road Homebush and the Weston Milling site on Braidwood Avenue Enfield are the only industrial buildings which have heritage status. We do not agree that this building has no heritage status, it is certainly locally significant. This building could be reused or readapted for other uses such as administration, cafe for workers onsite etc.	The proposed site layout does not provide opportunities for retention for the Administration Building.		
	The Yard Master's Office has lost some of its features but restoration of this building or reuse would be not difficult as the building is substantially in-tact. We do not agree that this building has no heritage status, it is certainly locally significant. Further, the building appears to be in reasonable condition and there would be no reason not to maintain and reuse this building. The retention and reuse of these buildings would provide aesthetic enhancement in the proposed development of this site. It would also provide a visible link with the site's history.	The Yard Master's office has been assessed as being of local significance due to fabric losses. The proposed site layout does not provide opportunities for retention of this structure, as such full archival recording of this item would be undertaken prior to demolition.		
	These heritage items are owned and managed by the NSW Government, yet most are deteriorated, and have not been maintained. It is remarkable that items which the Government refers to as 'Assets' are in such poor condition and worse, that the few items which appear to be in good condition and could be easily reused such as the Administration Block, have been assessed as having no heritage significance.	Noted		

Issue Category	Comments	Response	Stakeholder ID	Name
Heritage/Archaeology	It would also be great to see re-use of the Pillar Water tank	Options for reuse of the pillar water tank, gantry crane and pedestrian footbridge are to be explored during the detailed design phase.	597	**DoP Submission no 21**

Submissions General Community: HYDROLOGY

Issue Category	Comments	Response	Stakeholder ID	Name
Hydrology	Drainage and sewerage could cause further problems as heavy rains in past years have caused floods in the Cooks River area. This flood plain has been alleviated by the upgrading of the river but since the work was finished we have not been out of drought conditions.	Noted. Hydrology and Hydraulics is assessed in Chapter 10 and Appendix D of the EA Report. Further consideration of hydrological issues would be undertaken during detailed design. The EA report concludes that all drainage water for a I in 10 ARI will be retained in a site detention basin	587	**DoP Submission no 5**

Issue Category	Comments	Response	Stakeholder ID	Name
justification for project	South West Enviro Centre supports the government's efforts to separate passenger and freight traffic and to increase the rail share of container movement. However, relying on the Enfield facility to achieve this is a short-sighted attempt to be seen to be doing something in the short term. We believe that the Government should be urgently securing land at Eastern Creek and Moorebank so that more containers .can be transported greater distances by rail, via Enfield. If the expansion at Enfield goes ahead, development of outlying terminals is unlikely to happen for many years.	The FIAB report prepared as part of the Government's Metropolitan Intermodal Freight Strategy for Import and Export Containers (refer Metropolitan Strategy – Transport Strategy for Sydney) supports the need for the Enfield ILC as part of a number of intermodal terminals required to serve the Sydney Basin and to achieve the Governments mode share target. Alternatives have been considered in Chapter 3 of the EA Report. This provides details of the required characteristics required for an intermodal facility. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed. Other sites further west and south west will also be developed. Containers from Newcastle or Port Kembla would still need to travel by train or truck into the inner and middle western areas of Sydney where the market catchment is.	447	**DoP Submission no 315,158**
justification for project	A Commission of Inquiry and the DoP has recommended against the Port Botany expansion, so the NSW Government is not justified in pushing ahead. There is a lot of support for Newcastle to become a container port. A port expansion of Newcastle instead of Botany would render the Port Enfield proposal unnecessary. The Summer Hill- Ashfield Greens support the aim of the NSW Government to transfer more freight movements from road to rail as a way of reducing greenhouse gas emissions. However, the above proposal puts freight on rail only for the short distance between Port Botany and Enfield. There is already a direct link between Sydney and Newcastle. Instead of expanding Port Botany and constructing the Enfield Intermodal Logistics Centre, the NSW Government should upgrade the ports of Newcastle and Port Kembla to cater for any increase in freight movements. This would result in employment growth in Newcastle and Wollongong, both areas in need of more employment.	Noted The FIAB report prepared as part of the Government's Metropolitan Intermodal Freight Strategy for Import and Export Containers (refer Metropolitan Strategy – Transport Strategy for Sydney) supports the need for the Enfield ILC as part of a number of intermodal terminals required to serve the Sydney Basin and to achieve the Governments mode share target. Alternatives have been considered in Chapter 3 of the EA Report. This provides details of the required characteristics required for an intermodal facility. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed. Other sites further west and south west will also be developed. Containers from Newcastle or Port Kembla would still need to travel by train or truck into the inner and middle western areas of Sydney where the market catchment is.	686	**DoP Submission no 73**

Issue Category	Comments	Response	Stakeholder ID	Name
justification for project	NoPE does not agree that intermodal terminals and associated rail upgrades should be treated as critical infrastructure whose approval is at the sole discretion of the Minister for Planning. What faith can we have in a Minister who declared the proposed desalination plant at Kurnell as the first ever "critical development" and then downgraded it to a "last resort" option a few months later? Apparently a development is only "critical" if there is no voter backlash associated with it.	Noted	30	**DoP Submission no 93**
justification for project	In February 2003, a review called the Morris Report of an earlier version of this development proposal concluded that the Enfield ILC should not go forward. Essentially, very little has changed since then. Why is this proposal being reconsidered when expert reviewers have concluded that this development will largely have a negative impact?	The proposed ILC differs from the previous Intermodal Logistics Terminal put forward for the Enfield site, which was to manage a throughput of 500 000TEUs, rather than 300,000 TEUs which is currently being proposed. Further details of the project need and alternatives are provided in Chapter 3.	786	**DoP Submission no 106**
justification for project	Why would you want such a storage depot in the middle of already traffic only 18 kms away from Port Botany? It simply does not make sense when there are rail links to places like Newcastle and Wollongong that need the work.	Information on project need and alternatives is provided in Chapter 3. Containers from Newcastle or Port Kembla would still need to travel by train or truck into the inner and middle western areas of Sydney where the market catchment is.	87	**DoP Submission no 102**
justification for project	Do we need this expansion of the freight network? Should Sydney be the main port of call? Does Port Botany need to be expanded? Newcastle and Wollongong are willing to take some of the burden off Sydney. Goods could go to and from country areas from these two ports, country rail revived to accommodate this.	The FIAB report prepared as part of the Government's Metropolitan Intermodal Freight Strategy for Import and Export Containers (refer Metropolitan Strategy – Transport Strategy for Sydney) supports the need for the Enfield ILC as part of a number of intermodal terminals required to serve the Sydney Basin and to achieve the Governments mode share target. Alternatives have been considered in Chapter 3 of the EA Report. This provides details of the required characteristics required for an intermodal facility. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed. Other sites further west and south west mayalso be developed in the future.. Containers from Newcastle or Port Kembla would still need to travel by train or truck into the inner and middle western areas of Sydney where the market catchment is.	793	**DoP Submission no 147**
justification for project	Too many containers are being trucked along suburban streets instead of travelling closer to their destination by rail. I am astounded that SKM could promote Enfield as being most appropriate by being 'located within the market catchment it would serve when it is at the very easternmost	The FIAB report prepared as part of the Government's Metropolitan Intermodal Freight Strategy for Import and Export Containers (refer Metropolitan Strategy – Transport Strategy for Sydney) supports the need for the Enfield ILC as part of a number of intermodal	597	**DoP Submission no 21**

Issue Category	Comments	Response	Stakeholder ID	Name
	tip of that 'inner and Middle West region' of Sydney that receives 80% of import and export containers in Sydney.	terminals required to serve the Sydney Basin and to achieve the Governments mode share target. The ILC is the only suitably sized industrial site within the market catchment area it serves, linked by a dedicated freight line to the port. Alternatives have been considered in Chapter 3 of the EA Report. This provides details of the required characteristics required for an intermodal facility. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. The environmental assessment has demonstrated that impacts on the local community will be able to be managed. Other sites further west and south west will also be developed. Containers from Newcastle or Port Kembla would still need to travel by train or truck into the inner and middle western areas of Sydney where the market catchment is.		
justification for project	If you want a larger one-off benefit to the state, it's to privatise the land into smaller blocks and build factories and light industrial units. This will be of greater benefit not only to the state because of the one-off selling of the land, but also generate a recurrent benefit to the local economy, the state's economy and national economy. Privatising and subdividing the land into factories and light industrial areas, goods and services will add to Received the national balance of payments - this is because more jobs will be created than the current proposed facility, goods and services will be produced adding to the national accounts will be produced. On a national economic point of view, the proposed facility given the lack of infrastructure will only encourage the importing of goods which will only decrease the balance of payments.	Noted.	814	**DoP Submission no 135**
justification for project	Why the freight industry dependent as it is on the efficiency of the road network and the absence of congestion and queuing would be remotely interested in the Enfield location as an economically viable proposition, which can, according to the Environmental Assessment, only get worse over time, is unfathomable. Further, suitability of the site in terms of its ability to cope with the constraints provided by an already dysfunctional road network must be a key consideration if the facility is to achieve long term economic viability from freight operators' viewpoint.	A network of intermodals across Sydney is proposed to transfer freight from road to rail to minimise the volume of trucks on the road from Port Botany. Further details are provided in Chapter 3. Traffic issues are addressed in Chapter 7 and Appendix B.	817	**DoP Submission no 120,181**

Issue Category	Comments	Response	Stakeholder ID	Name
justification for project	I am not convinced that an Intermodal Facility in the Enfield location has been justified on economic, social or environmental grounds. It would seem that the boundary set by Sydney Ports is roughly M7 to the west, M4 to the north but taking in from Blacktown to Parramatta and the M5 to the south taking in Liverpool, Moorebank and Milperra. Clearly the Enfield site is to serve much wider than the 'local" market, however defined, or indeed the "inner western" market. This suggests that there has been no consideration of, nor likely implementation of a network of freight terminals in the near or distant future as recommended by the FIAB and Milton Morris. The stated cap on throughput of 300,000 ten's is therefore hardly credible.	Noted The throughput limit on the site is set at 300 000 TEUs. The proposed ILC forms part of the proposed network of intermodals. The FIAB report prepared as part of the Government's Metropolitan Intermodal Freight Strategy for Import and Export Containers (refer Metropolitan Strategy – Transport Strategy for Sydney) supports the need for the Enfield ILC as part of a number of intermodal terminals required to serve the Sydney Basin and to achieve the Governments mode share target. It should be noted SPC does not own the other sites identified iin the FIAB report for future ILCs.	817	**DoP Submission no 120,181**
	The notion of Enfield as the only terminal would underscore why the catchment market envisaged in the EA and Sydney Ports rational and justification is so wide it also may help explain the reluctance of Sydney Ports and the framers of the EA to take any real responsibility for off site impacts or off site improvements that might make the proposal actually work and truly ameliorate adverse effects on local communities. This requires a whole of government approach. The ability or indeed the intention of the proponents to cap output to 300,000 teu output is not credible under these circumstances. Clearly the Enfield site is to serve much wider than the 'local" market, however defined, or indeed the " inner western" market. This suggests that there has been no consideration of nor likely implementation of a network of freight terminals in the near or distant future as recommended by the FIAB and Milton Morris. The stated cap on throughput of 300,000 ten's is therefore hardly credible.	This is a matter for the NSW Government and is addressed in the Metropolitan Strategy. The ILC is designed for a throughput of 300 000TEUs only and this will be capped by conditions of consent. .	817	**DoP Submission no 120,181**
justification for project	The role of the existing National rail terminal at Chullora. If Enfield is now to handle not only imports but also exports is this enlarged use intended as a competitive or complementary operation? With 2 operations side by side how will traffic and localised impacts of combined activities be managed and controlled? If the capacity of TEU's increases, how will absolute numbers and therefore volume of freight handled be contained? If no further terminals contained in the overall FIAB recommendations are developed through lack of commitment or funding or inabilty to achieve dedicated freight lines, where does that leave Enfield?	Chullora deals primarily with interstate freight, not port related. The FIAB report prepared as part of the Government's Metropolitan Intermodal Freight Strategy for Import and Export Containers (refer Metropolitan Strategy – Transport Strategy for Sydney) supports the need for the Enfield ILC as part of a number of intermodal terminals required to serve the Sydney Basin and to	817	**DoP Submission no 120,181**

Issue Category	Comments	Response	Stakeholder ID	Name
		achieve the Governments mode share target.		
justification for project	The capacity of the intermodal terminal at Enfield should not be expanded. It could be upgraded to handle containers and trucks more efficiently, but expansion is unnecessary to achieve efficiencies. Enfield should be a much smaller component in the strategy covered by this report.	The provision of intermodal facilities at Enfield has reduced from previous plans for a 500 000 TEU facility to the current proposal for 300 000 TEUs. The potential market for an intermodal facility has been examined using volumes of import and exports delivered to or coming from the inner and middle western areas of Sydney. This identified a market for another intermodal, by 2011 of approximately 500,000 TEUs. Further details are provided in Chapter 3.	447	**DoP Submission no 315,158**
justification for project	I make the point that there is very little sense in locating an Intermodal Logistics Centre in Enfield some 18km from Port Botany. The economic viability of double handling and transporting the containers for such a short distance is questionable. I call on the Department of Planning to carefully consider the logic of an Intermodal Logistics Centre located at Enfield, at a time when no commitment has been made to implementing the recommendations of the Freight Infrastructure Advisory Board report "Railing Port Botany's Containers" nor the recommendations of the Hon. Milton Morris AO.	Further consideration of the need for an intermodal facility at Enfield is provided in Chapter 3. Noted.	801	**DoP Submission no 149,183**

Submissions General Community:LAND USE

Issue Category	Comments	Response	Stakeholder ID	Name
Land Use	It should be kept in mind that the nearby Pacific National Terminal makes a major contribution to night-time road congestion, noise, light spill and pollution in the area, as do the numerous traffic generating business operations at Chullora, such as Australia Post, News Ltd, Fairfax, Weston's Bakery, and the Waste Recycling Centre, etc.	Noted	447	**DoP Submission no 315,158**
Land Use	It cannot be overstated that this proposal is for massive and some would contend over development within an existing industrial area that is surrounded by residential areas. The predominant land use is residential, not industrial. The EA states that the site is ideally located in terms of accessibility to the local and regional road network and the proposed land use matches the existing land use for the area (p!6Final Transport Working paper). This is patently false. The predominant land use is residential. The former Enfield Marshalling Yards site is part of an isolated industrial pocket surrounded by low density and far the most part quality housing or housing undergoing renovation/reconstruction in the suburbs of Strathfield South, Belfield, Greenacre and Belfield. The site is also adjacent to the Hume Highway, targeted by the State Government for higher density residential development. How can this be compatible with the intermodal terminal proposed	Further details on land use are provided in Chapter 14. The land use map (Figure 14-2), based on the LEP zoning, shows the immediate surroundings to be industrial with residential development to the south east of the proposed ILC.SPC is not aware of any State Government plans to redevelop the proposed ILC site for higher density residential development	817	**DoP Submission no 120,181**
Land Use	Most of Liverpool Road at the east of the proposed Enfield ILC is residential, mainly home units and townhouses. Many residential areas of Strathfield and Strathfield South are accessed from Liverpool Road., / , Streets such as Hedges Avenue, Wallis Avenue and Homebush Road intersect with Liverpool Road. While there are larger businesses in Cosgrove Road such as Toyo Tyres, one of the/, businesses identified by Sydney Ports as a 'key business' in the Enfield Catchment area, there are many smaller businesses on Cosgrove Road such as smash repairers, auto, repairers, transmission, paving companies etc. These businesses service the local and regional community and depend on access and on-street parking for their customers.	Noted There is no intent to prevent legal on-street parking in Cosgrove Rd. The requirements of local businesses would be considered during preparation of the Local Area Traffic Management Plans.	31	**DoP Submission no 136**
Land Use	Sydney Ports' estimation of the extent of industrial property in the inner and middle- western suburbs of Sydney does not take into account the fact that many industrial properties in these suburbs are being sold and re-developed for other uses, such as commercial and residential.	Land use changes from industrial to residential will not be at a significant scale. The predomionate uses will be as specified in the EA.	447	**DoP Submission no 315,158**
Land Use	The current proposal does not fully utilize the land. It is far more efficient to load the goods onto b-doubles and semi-trailers than to offload containers from the train and offload the goods from the containers into smaller trucks. Simulation studies will probably show that it is more efficient to load containers made specifically for transport	Two thirds of the containers through the ILC will be offloaded directly onto trucks. The warehousing will provide for about one third of the containers to be broken down into smaller components for transport off site in smaller trucks – 8-10 tonnes.	814	**DoP Submission no 135**

Issue Category	Comments	Response	Stakeholder ID	Name
	on ships and b-doubles and semis than to offload the goods from containers and then place them into trucks.			
Land Use	Any use of the Enfield Marshalling Yards as a freight terminal should not be approved. The site is completely unsuitable for such facility given its proximity residential areas and the adverse community and environmental impacts the redevelopment would create. It would have disastrous impacts on our community, our environment and on our roads.	The surrounding area is predominantly industrial. A series of mitigation and management measures are proposed for operation to minimise the potential impact on sensitive receivers.	794	**DoP Submission no 117**
Land Use	(Other development near the site includes) Norfolk Village and other homes, Chullora Primary School, Malek Fahd Islamic Primary and High School. This school shares a border with Norfolk Village and Woolworths Market Place, a recently expanded shopping mall. Also on waterloo Rd is the main shopping strip for Greenacre. It is a very busy area with constant moving of traffic to the schools, the shopping centres the houses as well as the main artery and precinct for the whole of Greenacre's residents and visitors alike.	Noted.	793	**DoP Submission no 147**
Land Use	We have had in Strathfield, Homebush and Enfield areas a huge increase in units, high rise etc and this has caused an upsurge of traffic with poor road construction round abouts slowing down particularly emergency traffic (Fire Brigade, Ambulance) and buses have their worries too.	Noted	87	**DoP Submission no 102**
Land Use	We question whether the ILC proposal, which seems to be comprised of a large percentage of what amounts to warehousing space, would be considered by the public as either "critical infrastructure" or "major project".	SEPP (Major Projects) applies to the proposed ILC in that intermodal terminals are Major Projects and Part 3A of the EP&A Act applies. Statutory planning is detailed in Chapter 2.	30	**DoP Submission no 93**
Land Use	Necessity rather than choice has resulted in the encroachment of residential areas around the former marshalling yards and its neighbouring light industrial zone Indeed when the Marshalling Yards were built at Enfield, the area was mostly empty fields. Even in the 1950's there was more vacant land in the vicinity of the marshalling yards than anything else. As rents and other costs increase ,business owners may be forced to move to other locations. Furthermore landowners are increasingly enticed by the profits to be made in rezoning industrial and commercial land to residential land. This will mean that an intermodal at Enfield will no longer be conveniently located to many commercial an industrial sites. There are many examples of commercial and or industrial enterprises which have over the years decentralised to what was once Sydney's hinterland and we need not list them here.	The population of Sydney has steadily increased as such so has the demand for housing and associated infrastructure. Land use is controlled through Council's Local Environmental Plans which dictates the nature of development permissible within certain areas. The industrial lands in Sydney's inner and middle western areas are unlikely to be rezoned. Further details are provided in Chapter 14.	736	**DoP Submission no 129,130**

Issue Category	Comments	Response	Stakeholder ID	Name
Land Use	The site is completely unsuitable for such facility given its proximity to residential areas and the adverse community and environmental impacts the redevelopment would create	Land use immediately surrounding the site is predominantly industrial. Further details are provided in Chapter 14.Community and environmental impacts were fully assessed in the EA. Mitigation measures identified will be further developed during detailed design. Mitigation and management measures would be implemented through Environmental Management Plans for the construction and operation phases.	107	**DoP Submission no 68**
Land Use	There is a high density of residential populations in the areas surrounding the marshalling yards	Land use immediately surrounding the site is predominantly industrial. Further details are provided in Chapter 14.	671	**DoP Submission no 76**
Land Use	With all the internal roads, administrative buildings, diesel and LPG storage and fuelling, container wash down area, vehicle maintenance shed and installation site services including all utilities, a community and ecological area (for fresh pollution) a light industrial/commercial area, rail sidings, railway lines and warehousing for the packing and unpacking of containers and short term storage cargo, where and how are the 300,000 shipping container units and ll the empty containers going to fit?	The layout for the site is shown in Chapter 4 of the EA. Detailed design for storage locations for the shipping containers will provide more detail. Figure 4-2a in Chapter 4 shows the area allocated to intermodal activities and empty container storage.	649	**DoP Submission no 65**
Land Use	We in the Norfolk Village and surrounding streets already have to contend with both the Boral Concrete Batching Plant and the Boral Asphalt Plant which are located on Roberts Rd Greenacre across the road from the Norfolk Village and surrounding streets. Also the Finemores trucking company which is also located on Roberts Rd.	Noted	630	**DoP Submission no 39,98**
Land Use	In terms of land use the assessment claims that" benefits would arise through rehabilitation of the southern end of the site through the possible reuse of the Tarpaulin factory building and creation of the Community & Ecological area". Isn't this the exact same area where huge ugly noise walls would be erected? How is this defined as rehabilitation?	Noise barriers to be installed in this part of the site would generally be landscaped. Further details are provided in Chapters 11 and 16. The Community and Ecological area is to be rehabilitated through removal of noxious and invasive species. The final design and use of both the Tarpaulin Shed and the Community and Ecological area, would be developed in consultation with Council and the community, but would include landscaping and planting to encourage native wildlife and provide passive recreational opportunities.	842	**DoP Submission no 325**
Land Use	I would like to see the area developed for a community use and left as open space. We in Canterbury and nearby councils are running out of open space and I strongly object to losing this open space to the port.	The final design and use of both the Tarpaulin Shed and the Community and Ecological area and future use would be developed in consultation with Council and the community	588	**DoP Submission no 7**

Submissions General Community: MANAGEMENT

Issue Category	Comments	Response	Stakeholder ID	Name
Management	If the Department decides to approve the project we request as a minimum the following: Site management monitoring, noise limits to protect local residents and businesses, air quality, traffic levels and noise monitoring.	Construction and Operation Environmental Management Plans are to be prepared to cover issues including noise, air quality and traffic. These will provide details on monitoring. Noise levels to be met are defined in the noise study and the proposal will aim to comply with these. SPC will also ensure that it engages with the local community in both construction and operational phases using community focussed working groups. In this regard, SPC has already established to Traffic Working Group which has met 5 times.	686	**DoP Submission no 73**

Issue Category	Comments	Response	Stakeholder ID	Name
Noise	Already the noise level is very high. We are already fully congested with noise.	Noted.	646	**DoP Submission no 62**
Noise	It would appear that the centre will generate operations involving one train every seven minutes seven days a week. The trains quite obviously are large trains with a significant number of carriages of sorts. Each train as it moves past any designated point literally takes a couple of minutes to pass and in doing so creates a regular and continuous noise. Following its departure it is then only 5 minutes before this process is once again repeated. The noise of regular gear changes and air brakes only adds to the noise pollution from the almost ceaseless clanging of train wheels on the tracks.	Noted. The train movements entering and leaving the site will be no more 20 per day. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	626	**DoP Submission no 36**
Noise	I object on the basis of: the noise factor that will be suffered by the affected residents when the monstrous structure, and bridge from Cosgrove Road Enfield to Wentworth St Greenacre is being built The noise that will affect residents with the enormous amount of extra truck movements along Roberts Road each day if the proposal goes ahead. The fact that the railway tracks leading into the Enfield site were built around 1905 and originally designed to carry steam trains. Diesel trains began operation some 20 years later. The weight distribution of today's trains is a major noise issue. Current trains stop on the hills and restart thus causing the appalling screeching noise	Noise effects from site operations will be managed to an acceptable level. Noise issues would be addressed in more detail through the Environmental Noise Management Plan and in detailed design stage. Traffic noise was addressed in Chapter 11. The traffic generated by the ILC will not cause any significant increase in traffic noise. Noted. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	630	**DoP Submission no 39,98**
Noise	The building of the ILC is substantial and will result in a large increase in semi trailer truck movements in the Enfield area. Since the Enfield and surrounding areas are predominantly residential, this will result in a number of detrimental effects including, noise pollution	Traffic noise was addressed in EA Report Chapter 11. The traffic generated by the ILC will not cause any significant increase in traffic noise. Traffic in residential areas would be managed through a Local Area Traffic Management Plan to be prepared during detailed design.	631	**DoP Submission no 42**
Noise	Trains trucks, brakes. Trucks gear change pulling up hill, movement of containers, cranes and the positioning of containers on their steel pegs. Noise barrier made of trees and soil mound if what is described in the diagram this is an area that will attract undesirables to prey on others to bash and rape within the thick undergrowth (this area is becoming prevalent to this type of behaviour)	Noted. Design of noise mounds and associated landscaping would take into consideration the potential for undesirable and antisocial behaviour, and be managed to minimise opportunities for graffiti etc.	512	**DoP Submission no 45**
Noise	Already the noise level is very high. We are already fully congested with noise.	Noted.	633	**DoP Submission no 46**

Issue Category	Comments	Response	Stakeholder ID	Name
Noise	I object to the proposal to build a port at Enfield because of noise	Noted.	583	**DoP Submission no 1**
Noise	Already the noise level is very high. We are already fully congested with noise.	Noted.	642	**DoP Submission no 62**
Noise	The noise level (on Roberts Rd) has increased dramatically and continues throughout both day and night. Our windows have not been double glazed and at times it is practically impossible to hear either TV or Radio without an increase in the sound level.	Noted. Traffic noise was addressed in EA Report Chapter 11. The traffic generated by the ILC will not cause any significant increase in traffic noise.	623	**DoP Submission no 32**
Noise	sound barriers will not stop the cacophony from the proposed centre and train lines floating down to the picturesque Bay-to-Bay walk and cycle track, the Strathfield Golf course and the million dollar homes in the area	Acoustic barriers and landscaping proposed for the site is to be developed further during detailed design. Noise effects from site operations will be managed to an acceptable level.	671	**DoP Submission no 76**
Noise	My husband and I purchased our home on Punchbowl Rd, Belfield, 3 years ago and found that the noise and pollution is already terribly distressing.	Noted.	681	**DoP Submission no 94**
Noise	These operations will result in increased noise	Noise issues are considered in EA Report Chapter 11 and Appendix E.	686	**DoP Submission no 73**
Noise	Within the EA there is no mention of provisions to guard against the huge increase in noise pollution and vibration that will directly affect myself and other residents living near the freight line in Marrickville. The provision of noise barriers etc along residential areas appears to be a reasonable minimum requirement should your project go ahead, regardless of tax payers dissent. I therefore request that Sydney Ports conduct a more detailed study outlining their strategies for minimising the noise associated with this project and the expansion of Port Botany, in regards to the entirety of the line not just at Port Botany and Enfield as contained in this assessment.	The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	563	**DoP Submission no 95**
Noise	We are already subject to a lot of noise. Imagine a very hot night where we have to close our windows and take the heat instead of the noise.	Noted.	706	**DoP Submission no 77**
Noise	We believe that if the construction of the terminal is to go ahead, it would cause and increase in noise. Living only one street away from the proposed terminal we would be exposed to the increased noise involved in freight being moved along the existing rail line from Port Botany to the terminal.	Noise issues from the site are addressed in Chapter 11 and Appendix E. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	711	**DoP Submission no 69**

Issue Category	Comments	Response	Stakeholder ID	Name
Noise	I am a local resident of Belfield and am gravely concerned about the noise levels that we are currently experiencing - let alone once and if this proposal goes ahead. The screeching of brakes that can last for serval minutes and the loud chugging of the diesel engines is extremely unfair to all residents and this is happening 24 hours a day 7 days a week. I have read the Sydney ports web site and they claim that there will be noise barriers installed. My question is will these barriers be installed along the entire railway line and not just at the marshalling yards?	Noted. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will be happy to work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. The noise barriers proposed by SPC are intended to address noise from on site operations of the ILC.	638	**DoP Submission no 61**
Noise	The freight terminal will concentrate truck numbers and movements in our local community resulting in more noise. The increase in noise is unacceptable	Noted. Traffic noise was addressed in Chapter 11. The traffic generated by the ILC will not cause any significant increase in traffic noise. Traffic would be controlled through a Local Area Traffic Management Plan. This would be prepared with due consideration of potential impacts on residences in the area.	596	**DoP Submission no 19**
Noise	There is already too much noise in and around the proposed area, and leeching into the area where I reside. I am also in the Enfield flight path from Sydney Airport as well as the Enfield marshalling Yards have been a bone of contention for may years for the noise churned out late at night interfering with sleep. The mind boggles at what it could become with the installation of a container terminal No thank you.	Noted. Noise effects from site operation will be managed to an acceptable level. issues would be addressed in more detail through the Environmental Noise Management Plan. The noise barriers proposed by SPC are intended to address noise from on site operations of the ILC.	585	**DoP Submission no 3**
Noise	Future development will bring extra noise. From accounts made public the railway will be a 24 hour 7 days a week concern which will lead to a much greater noise level from engines and shunting rail traffic. Noise problems will also be a problem for the surrounding area especially on still summer nights or nights with low cloud and humidity. No matter how hard the people working in the ILC try, noise will not be kept to a minimum. When the jeep assembly factory was operating in Cosgrove Rd many years ago, people living in this area were able to hear the assembly working even though the factory stopped early in the night. How much more noise will be heard from a large area of land with no barriers. The Facility will operate 24 hours a day and therefore cause noise pollution in an area mainly residential.	Noise effects from site operation will be managed to an acceptable level. Issues would be addressed in more detail through the Environmental Noise Management Plan. The noise barriers proposed by SPC are intended to address noise from on site operations of the ILC.	587	**DoP Submission no 5**
Noise	Much is said about noise pollution from the site. There have been pledges from the Enfield Ports that they can handle this. In truth this will be impossible to maintain. My objection is to the noise along the track that seems to be overlooked. I live in the section where Paxton Ave runs beside the line just beyond Belmore North Public School, where the rack has veered from the main line en route to Enfield.	Noise effects from site operation will be managed to an acceptable level. issues would be addressed in more detail through the Environmental Noise Management Plan. The noise barriers proposed by SPC are intended to address noise from on site operations of the ILC. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and	499	**DoP Submission no 10**

Issue Category	Comments	Response	Stakeholder ID	Name
	The curfew is on for planes- these thundering monsters (trains) on the night take longer to pass than planes. At night I never open windows and haven't an air conditioner. The noise just accelerates	ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor		
Noise	Concern about increase in noise. We do not want our residential suburb to become a commercial port. Imagine the increase in frequency of goods train and hundreds of trucks on the local roads. We do not want our children to grow and suffer in such a noisy and polluted environment.	Noted. See above.	588	**DoP Submission no 7**
Noise	Project will create noise pollution	Noted. See above	589	Allegretti, Ms Anna **DoP Submission no 9**
Noise	The increased number of trucks travelling to and from the logistics centre on our roads also means they will create more noise.	Noted. Traffic noise was addressed in Chapter 11. The traffic generated by the ILC will not cause any significant increase in traffic noise. Traffic would be controlled through a Local Area Traffic Management Plan. This would be prepared with due consideration of potential impacts on residences in the area.	591	**DoP Submission no 14**
Noise	I feel that some form of sound insulation, screening, alterations and discussion should be proposed with me before approval as my house is in the firing line.	Further consideration of appropriate noise mitigation measures will be undertaken at the design and develop stage.	539	**DoP Submission no 35**
Noise	The proposal will lead to more noise- noise which is very high now	Noted. See comments above	593	**DoP Submission no 16**
Noise	Our thoughts are about the noise. And the noise from the very long trucks.	Noted. See comments above	625	**DoP Submission no 33**
Noise	The Minister for Planning should look very carefully at determining the speed at which these goods trains should travel, to reduce the noise to homes level with or below the level of the rail line.	Noted. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor	597	**DoP Submission no 21**

Issue Category	Comments	Response	Stakeholder ID	Name
Noise	The main issue we have is with the plant operating on the site, namely the container fork lifts and their reversing alarms. The noise impact report states that the noise level from container forks will be 120DB (A) and reversing alarms 107 dB(A) (p11.13). One wonders , why bother having reversing alarms that are not as loud as the plant/ Will Work cover require extra loud alarms at a later date?. The reason that we are concerned about the noise impacts is because of the figures shown above and the fact that the report states that noise levels exceed the NSW Sleep Arousal Criteria. The report uses term like "…. May not actually occur in practise" and "…. They are not considered loud enough to cause an impact on surrounding residents' (P11.13). These terms are used to soften the impact. The fact is the noise levels will be enough to cause an impact on residents. This is shown clearly in the report. The locations that the noise readings were taken give us some concern as well. The locations are subject to traffic noise at night (Hume Hwy and Cosgrove Rd). In quiet areas the reversing alarms will be very intrusive. The noise barriers will reduce plant noise, but reversing alarms need to be intrusive by nature and we feel that our tranquility sleep will be compromised	Noise during construction and operation would be managed through an Environmental Noise Management Plan. This would include consideration of mobile plant used on site including options for reducing impacts from reversing alarms. The noise of the plant will not reduce the effect of the reversing alarms. Noise effects from site operation will be managed to an acceptable level. issues would be addressed in more detail through the Environmental Noise Management Plan. The noise barriers proposed by SPC are intended to address noise from on site operations of the ILC. Reversing alarms were included in the predictions of noise generation from the site and were considered in the conclusion that noise effects from site operation will be managed to an acceptable level	599	**DoP Submission no 23**
Noise	We have too much noise already from heavy vehicles using their engine brakes unnecessary, coming down Liverpool Rd to turn into Cosgrove Rd at night and early hours of the morning to go to the TNT courier delivery base. We have to keep our front windows and door closed to help stop the noise. Engine or exhaust brakes should be banned from use in Metropolitan area and country towns.	Noted.	93	Palmer, Mrs Bev **DoP Submission no 25**
Noise	Already the noise level is very high. We are already fully congested with noise.	Noted.	620	Schomberg, Mrs Rosanna **DoP Submission no 27,306**
Noise	Roberts Rd is an "EXPRESS" not a road for more trucks that fly past the homes creating noise	Noted.	622	Mitchell, Mr T **DoP Submission no 31,100**

Issue Category	Comments	Response	Stakeholder ID	Name
Noise	As I live near the intersection of Juno Pde and Roberts Rd, the noise of brakes and acceleration of trucks is already affecting my health as the noise wakes me up all the time. In the event of the terminal opening there will be 24 hour noise unloading, loading shunting and train engine noise. Adding to that the noise and pollution from 24 hour trucks entering and departing the terminal using Roberts Rd as its main access point. I note there are no noise barriers on the Roberts rd direction. We need noise barriers along Roberts Rd or high brick fences to buffer the noise.	Noted. Noise effects from site operation will be managed to an acceptable level .Issues would be addressed in more detail through the Environmental Noise Management Plan. The noise barriers proposed by SPC are intended to address noise from on site operations of the ILC. A noise barrier is proposed along Roberts Rd.	571	Hobbs, Mrs Thelma **DoP Submission no 13,154,170**
Noise	The railway line in Bruce Ave Belfield will be used a lot more than at present and the extra noise to Belfield residents will be extreme.	Noted. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will be happy to work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor	592	Bryant, D.M. **DoP Submission no 15**
Noise	The proposal will result in increased noise	Noise issues are discussed in Chapter 11.	45	Bezzina, Mr J **DoP Submission no 179**
Noise	understand that Bankstown Council also objects to this proposal and agrees that Boronia Rd should also be treated as a residential road and would not be suitable as a State road fro trucks due to the high number of residents residing on Boronia Rd, the surface not being suitable for heavy trucks , lack of noise barriers. Located along Boronia Rd are Banksia Public School, Greenacre Scout Hall and an aged care facility. The additional noise would impact on elderly and the youth of the community	Noted. Traffic noise was addressed in Chapter 11. The traffic generated by the ILC will not cause any significant increase in traffic noise. Traffic would be controlled through a Local Area Traffic Management Plan. This would be prepared with due consideration of potential impacts on residences in the area.	726	Gordon, Ms Christine **DoP Submission no 12,172,178**
Noise	If you stand in my backyard, you will see that already the noise level is high, if as per your report you make more lanes and use Cosgrove Road/Hume Highway exit, it will be impossible to even live inside the house (well, maybe by getting holed up inside with all the doors and windows closed and the house severely insulated! You can't even imagine how much noise, dust, vibration, pollution will be experienced by us. Even before the actual functioning starts, there will be so much construction traffic that our life would be made hell. When a truck turns from Cosgrove Road into Hume Highway, even if it is not fully laden, and moves towards Roberts Road, which is slightly uphill, it goes in first gear and right behind my house changes to second gear. Makes	Noted. Environmental management measures would be implemented for construction and operation to minimise and manage noise, air quality and vibration impacts. Further details are provided in Chapter 21. Noted. Traffic noise was addressed in Chapter 11. The traffic generated by the ILC will not cause any significant increase in traffic noise. Traffic would be controlled through a Local Area Traffic Management Plan. This	542	Goyal, Mr & Mrs Sanjeev & Sarika **DoP Submission no 122**

Issue Category	Comments	Response	Stakeholder ID	Name
	so much noise. Similarly when a truck is approaching the turning at Cosgrove Road, it starts to apply brakes and changes gears to low, there is huge rattling and breaking noise and all the windows in my house shake. This Port Enfield which will be operating 24/7, will eventually lead to movement all the time. Mr Barney, I have Civil Construction background and have worked on the Parramatta Rail Link project. I can imagine how much noise, vibration, pollution, dust would be generated by this. Its simply not a viable idea. No, this won't do. All the residents on Cave Road are already suffering from extreme noise. They have been living here for the last 25 or more years. Nobody had predicted that there would be an increase of so much traffic.	would be prepared with due consideration of potential impacts on residences in the area. See comment above. Noted.		
Noise	Further, within the Environmental Assessment itself, there is no mention of provisions to guard against the huge increase in noise pollution and vibration that will directly affect myself and other residents living near the freight line in' Marrickville. The provision of noise walls, or sound barriers etc along residential areas appears to be a reasonable minimum requirement should your project go ahead, regardless of tax payers dissent. At present the freight trains travelling along the route are often extremely noisy. I cannot conduct a conversation with a person in the same room let alone hear a radio or a TV. This needs addressing to improve the quality of life for residents.	Noted. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor	807	Podmore, Mr Richard **DoP Submission no 156**
Noise	Since the Enfield and surrounding areas are predominantly residential, this will result in a number of detrimental effects including, noise pollution, air pollution and a risk to local pedestrians.	Noise and air quality would be addressed within Operation Environmental Management Plans to be prepared for the site. Pedestrian safety will be a key consideration during preparation of the Local Area Traffic Management Plan.	809	Sciglitano, Mrs D **DoP Submission no 123**
Noise	The development could cause many hazardous implications such as: increased noise pollution, movements of heavy rail freight	Noise and air quality would be addressed within Operation Environmental Management Plans to be prepared for the site. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail.	810	Mortier, D&M **DoP Submission no 168**

Issue Category	Comments	Response	Stakeholder ID	Name
Noise	Noise pollution, air pollution and traffic congestion will increase and a whole of Sydney will be affected, including suburbs in the Bankstown Local Government Area where I live.	Noise and air quality would be addressed within Operation Environmental Management Plans to be prepared for the site. Traffic congestion will be a key consideration in the Local Area Traffic Management Plan.	811	Makin, Mr Stephen **DoP Submission no 125**
Noise	Further, within the Environmental Assessment itself, there is no mention of provisions to guard against the huge increase in noise, pollution and vibration that will directly affect myself and other residents living near the freight line in Marrickville. The provision of noise walls, or sound barriers etc along residential areas appears to be a reasonable minimum requirement should your project go ahead regardless of tax payers' dissent There should also be consideration given to the introduction of electrification of the line between Port Botany and Enfield. The gantries for power lines already exist as far east as Sydenham on this line and the investment in electric locomotives would be a major step forward in the reduction of pollution and noise in this area." As you may or may not be aware, the level of noise from living in close proximity to a freight line can be considerably worse than that experienced from a major road or a flight path. The causes of this are the high pitched squealing during braking, shunting of wagons against each other during changes of speed, the noise from up to four locomotives pulling 30 fully laden wagons up an incline and the wheel noise from poorly maintained rolling stock. Living under a flight path, as I do, I can assure you that the freight line has a much greater impact than aircraft on my life and those of my neighbours as it continues 24 hours a day.	Noted. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. There is no proposal by the State Government to electrify the line. Noted. See comment in para 1 above.	805	Macgregor, Mr Colin **DoP Submission no 124**
Noise	One of the highest concerns regarding this proposed development is noise, particularly from rail and traffic, particularly to nearby residential areas. As discussed, the Society is concerned about the viability of the Enfield Industrial area due to the impact of heavy vehicle traffic. The ILC proposal states that 'Commercial and light industrial activity at the southeast of the site on Cosgrove Rd will act as a buffer for residents'. If the Enfield industrial area becomes less viable for a range of businesses, the likely occupiers of land will be business associated with the ILC eg trucking companies. It is possible that the ILC or similar operations may explore future expansion on the southeast of Cosgrove Road.	Noted. Noise effects from site operation will be managed to an acceptable level. issues would be addressed in more detail through the Environmental Noise Management Plan. Acoustic barriers are also proposed to minimise impacts from site operations on sensitive receivers. Further details are provided in Chapters 11 and 16. The noise barriers proposed by SPC are intended to address noise from on site operations of the ILC. The ILC will be confined to the site for which approval is being sought.	31	Jones, Ms Cathy Strathfield Historical Society **DoP Submission no 136**
Noise	We also do not need more noise as we have enough through South Strathfield Primary School	Noted.	804	Brandt, Mrs M. L. **DoP Submission no 155**

Issue Category	Comments	Response	Stakeholder ID	Name
Noise	With respect to noise, many sensitive areas and some of them apparently distant from the site but still relevant were excluded from consideration in measurement and the effects of adverse metereological conditions downplayed. The disbenefits of 24/7 operation, a distinct reversal of established policy and practice for industrial developments adjacent to residential areas was not even canvassed. **Traffic estimates are questionable** Although the EA suggests that additional noise impacts will be minimal with the presence of the intermodal terminal, the evidence presented is contestable. The approach adopted by the EA is that there are existing or emerging noise pollutants, but few actually arising from the terminal. The EA deliberately excludes consideration of existing or proposed additional rail movements as a result of Port Botany expansion and their resultant impacts as well as excluding from assessment sites which might give unfavourable readings for actual and potential noise and a discounting of the very real problems associated with unique meteorological conditions in and around the site which amplify sound. However, the EA admits to noise exceedences in unfavourable weather conditions for up to 30% of the time, particularly in night time hours. (p28—v3) It may be illuminating that when the former Telstra site was developed in the early 1990's the acoustic studies accompanying the application indicated extreme levels of noise exceedence for residences along Roberts Rd. As a consequence conditions of consent by Strathfield Council included double glazing to several properties **Rail noise** Noise from rail is related to not only movements or numbers of trains but to the condition of the track, the degree of maintenance carried out on locomotives and rolling stock, the presence or absence of noise mitigation barriers and lastly the meteorological conditions prevalent which tend to amplify sound. All of these factors are currently negatively impacting on residents living in proximity to the site and rail line. The EA indicates that approximately 135 train movements per day will result from the Port Botany expansion. That is an increase from the current 28 per day or a staggering 235% increase. Of these 135, 20 will stop at Enfield. It is not credible that both cumulative noise and locomotive diesel particles will not impact on local residents. If this is not a concern of Sydney Ports then it surely is the concern of the State Government that approved Port Botany's expansion. **Truck noise** As with rail noise, Truck noise is related to movements but	Meteorological conditions were considered in the noise impact assessment. The area and its surrounds are zoned appropriately for the existing and intended use. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor Noise predictions under worst case conditions showed exceedances in adverse meteorological conditions. Appropriate mitigation measures will be developed at the detailed design stage to ensure compliance under those conditions. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	817	Gewandt, Ms Elizabeth Councillor Strathfield Council **DoP Submission no 120,181**

Issue Category	Comments	Response	Stakeholder ID	Name
	also to the location of the site in an "inversion" zone which under certain prevailing wind conditions amplifies sounds. The EA indicates that the road network is at or reaching capacity. Clearly this means that volumes are greater than the road system can handle and with this must surely be related noise pollution effects with respect to braking, queuing, idling etc. Any increase in movements has the potential to increase noise nuisance, particularly given the intention to operate 24/7 within an unfavourable meteorological zone. However, No consideration has been given to acoustic treatments beyond the site such as could be argued are required along the Liverpool Rd residential precinct and on Centenary Drive at Strathfield Golf Course. Again, if these are not issues for Sydney Ports, they are surely issues for State Government and/or RTA.	Cumulative noise impacts have been considered to the extent that NSW noise policy allows, through the application of the amenity criteria. It is noted that in NSW road, rail and industrial noise are assessed to their own separate criteria, as different types of noise are perceived differently in the community. There are currently no overall criteria that address total environmental noise.		
	The EA contends that dominant noise sources will come from idling of trains and plant operating in the loading/unloading area. This may well be so. However, experience with the site suggests the main sources of current noise are screeching of wheels on the rail line on certain gradients and with certain loads. If train numbers are to increase as predicted to 135 per day, this problem will grow. Remedy can only come from further regulation and inspection of locos and rolling stock and line maintenance and/or renewal.	The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor		
	Regulation and enforcement of all Noise sources along all rail and road corridors from port to market - adherence to EPA and other standards Resourcing of noise barriers along rail freight corridors where standards are exceeded Resourcing of noise mitigation measures along freight corridors/main arterial roads where standards are exceeded.	See above comments		
	Continual monitoring and resourcing/facilitation of upgrades and maintenance of dedicated freight lines Port Botany- Enfield and beyond Commitment to gradually implement noise attenuation barriers along the dedicated freight line where adjacent to residential development Imposition of standards of maintenance for locomotives and rotting stock to minimize screeching Controls on trucks braking/air compression brake use in/adjacent to residential areas Other points Consideration of additional noise barriers along Centennial Drive at Strathfield Golf Course to protect homes in Melville Ave and beyond from increasing road noise	SPC has no control over the age and type of locomotives which use the goods line. Further consideration of noise mitigation measures from on site operational noise will be undertaken during preparation of the environmental noise management plan.		
	Consideration of noise attenuation for proposed overhead road/bridge- meteorological conditions sound travel plus further augmentation on Liverpool Road at and on Roberts	Mitigation measures would be further investigated during the detailed design phase and implemented into the Environmental Noise Management Plan.		

Issue Category	Comments	Response	Stakeholder ID	Name
	road flyover. Permanent monitoring of additional sites for noise levels as above plus at properties on the Ada Ave elevation	 Management of noise impacts including monitoring requirements would be included in the Environmental Noise Management Plan.		
Noise	Noise suggestion maximum noise abatement measures should be implemented to ensure that there is minimum impact onto the neighbouring residential areas. This is particularly relevant in the still of the evening and night… where noise tends to carry a lot further than during the day. Earth mound hills, sound walls and barriers, tree planting and any other practical measures should be integrated into the development. This is something that is very important given the hours of operation. It should also assist in reflected night light.	Management of noise impacts including design of acoustic mounds, landscape planting and other noise mitigation measures are to be determined during detailed design and managed through the Environmental Noise Management Plan.	823	McGhee, Mr James **DoP Submission no 99**
Noise	People will be forced to move away from the rail noise	The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor	828	Austin, Mr Paul **DoP Submission no 182**
Noise	The traffic has caused and continues to cause excessive noise leading to discomfort and a poorer quality of life for residents. The noise of traffic particularly speeding trucks has meant that we are forced to bring down the block of shutter in the early afternoon so that we are able to block out at least part of the noise form traffic and thus blocking out the natural light.	Noted. Traffic noise was addressed in EA report Chapter 11. The traffic generated by the ILC will not cause any significant increase in traffic noise. Traffic would be controlled through a Local Area Traffic Management Plan. This would be prepared with due consideration of potential impacts on residences in the area.	829	Homaidan, Mr Ilham **DoP Submission no 245**
Noise	Further, within the Environmental Assessment itself, there is no mention of provisions to guard against the huge increase in noise, pollution and vibration that will directly affect myself and other residents living near the freight line in Marrickville. The provision of noise walls or sound barriers etc along residential areas appears to be a reasonable minimum requirement should your project go ahead regardless of tax payers' dissent.	The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor	831	Fay, Mrs M **DoP Submission no 316**
Noise	We support the concept of constructing dedicated freight lines across Sydney, but have grave concerns about the likely disturbance to residents from a 24/7 operation. We don't believe that noise walls in strategic locations along the tracks will be effective in reducing noise impacts. They certainly won't reduce vibration impacts. Operational noise at the terminals especially at night, is of	Noise mitigation measures are to be further investigated during detailed design and managed through the Environmental Noise Management Plan. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor Noted.	447	Jones, Ms Irene South West Enviro Centre **DoP Submission no 315,158**

Issue Category	Comments	Response	Stakeholder ID	Name
	concern.			
Noise	I have studied the Environmental Impact Statement (EIS) associated with the Intermodal Logistics Centre (ILC) at Enfield and believe the issue of noise and traffic have not been adequately addressed. Most of the noise measurement sites are close to main roads and may not be reflecting the true impact of the development. The report fails to adequately cover the subject of noise at night and the greater distance noise travels at night. Noise Contour Maps cover only two case scenarios, it does not include maps in prevailing wind condition or the distance noise travels at night, I suspect these scenarios will have a greater impact on the community compared to what is on public display. Night-time activities should be restricted to essential services only. Night time loading and unloading of trains and trucks should be taking place in a fully enclosed sound proof structure, (similar to TNT Enfield, Australia Post Rookwood). Empty container movement and all other noisy activities should be restricted to normal business hours Consideration should be given to banning B-Doubles Semi Trailers, especially at night.	Noted. The Environmental Assessment undertaken is adequate and the issues of noise and traffic have been appropriately addressed. Noise measurement sites and methodologies comply with requirements of the DEC Industrial Noise Policy, and reflect noise levels at sensitive receivers. Meteorological conditions and distance attenuation effects were considered in the noise assessment, and the results are shown on the contour maps. Noted. The ILC is to operate 24 hours a day 7 days a week. Appropriate noise mitigation measures would be implemented to minimise impacts to local residents. Noted. See comment above.	569	Roustas, Mr & Mrs Jim and Dorothy **DoP Submission no 131**
Noise	Dramatic increases in the number of trucks (an extra 900 semi-trailers / day) going along our roads and rail to and around from the site as under the proposal will result in more traffic, more pollution, more noise, increased risk of road accidents and loss of property values. Sydney Ports proposal would have severe impact on the health of the residents as well as traffic flow within 10km radius of the site causing traffic jam, noise, air and lighting pollution for nearby residents	Noted. Traffic noise was addressed in Chapter 11. The traffic generated by the ILC will not cause any significant increase in traffic noise. Traffic would be controlled through a Local Area Traffic Management Plan. This would be prepared with due consideration of potential impacts on residences in the area. A series of noise mitigation measures are proposed on site. Further details are provided in Chapter 11 and 16 and Appendices E and I. Amenity and property impacts is discussed in Chapter 17. Traffic and safety would be controlled through a Local Area Traffic Management Plan, air quality through a dust management plan.	794	Sinha, Nelly **DoP Submission no 117**
Noise	The EA has not considered the noise impact from locomotives travelling to and from the Intermodal Logistics Centre (ILC) at Enfield. This off-site impact cannot be considered as a separate issue and requires a full assessment so that the impacts and any required mitigation measures can be established. The question is	The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight	838	Carney, Clr Bill Mayor Strathfield **DoP Submission no 150,173**

Issue Category	Comments	Response	Stakeholder ID	Name
	asked at what stage will the impact of noise and local pollution from increased rail movements resulting from the FIAB report recommendations be assessed?	rail corridor		
Noise	We accept that a modal shift to freight rail is in principle a sound concept, but in our view freight rail /noise and the air quality impacts of dirty diesel locomotives are very real and substantial issues that must be addressed and resolved before such a shift occurs.	Noted. These issues are addressed within Chapters 11 and 12 of the EA Report. Environmental management measures are to be implemented to minimise impacts, however, SPC has no control over the age and type of locomotives which use the goods line. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor	30	Maddocks, Ms Jenny NoPE **DoP Submission no 93**
Noise	The building of the ILC is substantial and will result in a large increase in semi-trailer truck; movement in the Enfield area. Since the Enfield and surrounding areas are predominantly residential this will result in a number of detrimental effects including, noise.	Traffic projections are provided in Chapter 7. A series of mitigation measures are proposed as detailed in Chapter 21.	786	Sciglitano, Mr & Mrs Joe and Theresa **DoP Submission no 106**
Noise	We have to put up with the noise of freight trains all day and all through the night. There are two schools - Belmore North Primary and Belmore North Boys High – also affected by the noise from the freight trains and any further increase in rail traffic would be unacceptable.	Noted. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor	524	Young, Ms Sandra **DoP Submission no 110**
Noise	There is no mention of provisions against the huge increase in noise, pollution and vibration that will directly affect all residents along the freight lines: The provision of noise walls or sound barriers along residential areas should appear as a reasonable minimum requirement if the project were to go ahead regardless of tax-payers' dissent. Investigations are needed for noise limits applicable to the freight trains & carriages. Currently, some if not most freight trains & carriages are inordinately noisy. I humbly request that Sydney Ports urgently outline strategies for minimising the noise associated with its projects and the expansion of Port Botany, in respect of the entirety of the freight-line, not just at Port Botany and Enfield as contained in the assessment presented so far.	The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor SPC has no control over the age and type of locomotives which use the goods line. Noted.	788	Harris, Mr Tony **DoP Submission no 112**
Noise	The expansion of Port Botany has been estimated at	The ILC will assist in reducing the growth of truck	789	Brooks, Mr Simon

Issue Category	Comments	Response	Stakeholder ID	Name
	adding around 2,000 more trucks per day to Sydney's roads. When considered along with plans to dramatically increase the 'footprint' of Sydney Airport, the impact will be immense. Noise and air pollution and traffic congestion will increase and fifty suburbs all over Sydney will be affected, including suburb in the Canterbury Local Government Area where I live.	numbers carrying containers from Port Botany.		**DoP Submission no 113**
Noise	Further, within the Environmental Assessment itself, there is no mention of provisions to guard against the huge increase in noise pollution and vibration that will directly affect myself and other residents living near the freight line in Marrickville. The provision of noise walls, or sound barriers etc along residential areas appears to be a reasonable minimum requirement should your project go ahead, regardless of tax payers dissent.	The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor	806	Hang, Ms Vanessa **DoP Submission no 152**
Noise	It will generate noise from freight trains moving every seven minutes 24 hours a day from the expanded Port Botany through Tempe, Sydenham, Marrickville ,Hurlstone Park, Dulwich Hill, Canterbury, Lakemba, Belmore and Belfield meaning that people living in these suburbs along or near the railway line will be affected by the constant noise and vibration every hour of the day, every hour of the week, every day of the year.	The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor	793	Ledson, Ms Maree **DoP Submission no 147**
Noise	Mounds and concrete walls are not 100% effective in reducing noise even to single storey buildings. They are totally useless as regards second, third and other upper storeys of buildings. Residents in Mitchell Rd, Shortland Ave, Karuah St Barker Rd, Newton Rd Pemberton St, Melville Ave and Ada ST constantly suffer 98% of the noise and air pollution generated by passing traffic and trains on the freight line. Freight train noise is ear piercing (i.e. rattling, grinding and screeching due to friction of wheels on the tracks) at any time and is exacerbated by the driver's love of sounding the train whistle continuously.	Noise walls were shown to significantly reduce noise levels from the site, and were therefore incorporated into the concept design. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor	736	Zabetsch, Mr & Mrs Daria and Sandra **DoP Submission no 129,130**
Noise	We oppose the proposal as we already have trucks and semis at the moment and do not which (sic) to increase more pollution and noise	Noted. Details in relation to potential noise and air quality impacts are contained in Chapters 11 and 12 of the EA Report. Traffic noise was addressed in Chapter 11. The traffic generated by the ILC will not cause any significant increase in traffic noise. Traffic would be controlled through a Local Area Traffic Management Plan. This would be prepared with due consideration of potential impacts on residences in the area.	796	Karavokyros and Ntoumbos and Drivalas, A&D and J and P **DoP Submission no 169**
Noise	With 24/7 use residents will be greatly affected by a huge increase in noise pollution	Details in relation to potential noise and air quality impacts are contained in Chapters 11 and 12 of the EA Report. Noise mitigation measures are to be further developed during detailed design and further measures implemented through the Environmental Noise Management Plan.	798	Lucas, Mr Richard J **DoP Submission no 174**

Issue Category	Comments	Response	Stakeholder ID	Name
Noise	We have already plenty of noise by South Strathfield public school, situated between Homebush Road - Telopea Ave, - Liverpool Road and High Street. Children are screaming teachers are whistling, bells are ringing,	Noted.	799	von Oettingen-Brandt, Baroness M.L. **DoP Submission no 65**
Noise	On my street, already the noise level is very high.	Noted.	800	Siddiq and Hasan, Dr & Mrs Nadeem and Nahid **DoP Submission no 146**
Noise	The purpose of this submission is to object to the proposal. Reasons for the objection of this proposal include: • Increase in more noise and pollution levels in the community.	Noted. Details in relation to potential noise impacts are contained in Chapter 11 of the EA Report. Noise mitigation measures are to be further developed during detailed design and further measures implemented through the Environmental Noise Management Plan.	803	Nassar, Mr Mitri **DoP Submission no 153**
Noise	We believe the location of the proposed Centre is extremely inappropriate. This is a major concern as we know our Property's price value will dramatically decrease due to increased traffic and noise.	Noted. Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	792	Abboud, Laura **DoP Submission no 116**
Noise	The residents on Roberts Rd and surrounding streets would have to endure the noise from thousands of big semis 24 hours a day 7 days a week for ever	Details in relation to potential noise impacts are contained in Chapter 11 of the EA Report. Noise mitigation measures are to be further developed during detailed design and further measures implemented through the Environmental Noise Management Plan and Local Area Traffic Management Plan.	843	Anonymous 3 **DoP Submission no 167**
Noise	Furthermore, the report states that noise mitigation devices would be erected. Wow, I take it then that the noise barriers will span the entire 1.3km site. You know perfectly well that putting barriers in one section will do nothing to minimise noise. Furthermore the proposed barriers are said to go up at the south eastern side. Isn't this where the tarpaulin shed is and the "green community area" is going/ Someone please explain.	The location of proposed acoustic barriers is provided in Chapter 11 and 16 to be further developed during detailed design. No operations are proposed within the Community and Ecological area. SPC would consult further with the community about the future uses of the community and ecological area and the tarpaulin factory. Noise mounding is proposed to the north of the Tarpaulin shed as show in Figure 8 of Appendix I behind the existing light industrial/commercial development along Cosgrove Road.	841	Georgy, Mr Elias **DoP Submission no 323**
Noise	There will be an unacceptable increase in peak and ambient noise levels. Note from the EA document that: 'operational noise emission from the site may exceed the NSW DEC noise criteria without appropriate mitigative measures . Dominant noise sources were found to be the idling of trains and plant operating in the loading/unloading area. Sleep arousal may also occur under particular adverse weather conditions. The conclusion clearly indicates that despite mitigation unacceptable exceed aces will occur in Gregory St where no 9 is located		856	O'Carrigan Mr P **DoP submission number 329**

Issue Category	Comments	Response	Stakeholder ID	Name
pollution	Dramatic increases in the number of trucks (an extra 900 semi-trailers / day) going along our roads and rail to and around from the site as under the proposal will result in more traffic, more pollution, more noise, increased risk of road accidents and loss of property values. Sydney Ports proposal would have severe impact on the health of the residents as well as traffic flow within 10km radius of the site causing traffic jam, noise, air and lighting pollution for nearby residents	The truck movements generated by the ILC will be relatively small in the context of the road network and will not result in any significant increase in noise and pollution. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. The potential for impact on health, wellbeing, amenity and property values is considered in Chapter 17. Lighting impacts are considered in Chapter 16 of the EA Report.	794	**DoP Submission No 117**
pollution	It is going to create a lot of pollution for us living by	See above comment.	584	**DoP Submission No 2**
pollution	Future development will bring extra pollution	See above comment	587	**DoP Submission No 5**
pollution	Concern about increase in pollution	See above comment	588	**DoP Submission No 7**
pollution	The increased number of trucks travelling to and from the logistics centre on our roads also means they will create more noise.	The truck movements generated by the ILC will be relatively small in the context of the road network and will not result in any significant increase in noise and pollution.	591	**DoP Submission No 14**
pollution	The pollution will affect our health	Air quality and noise issues are considered in Chapters 12 and 11 of the EA Report . The potential for impact on health, wellbeing, and amenity is considered in EA Report Chapter 17.	93	**DoP Submission No 25**

Issue Category	Comments	Response	Stakeholder ID	Name
pollution	pollution must result from truck movements and no doubt infestation in the proposed storage areas will occur	Traffic during construction would be managed through a Construction Traffic Management Plan. During operation traffic movements to and from the site would be controlled through a Local Area Traffic Management Plan. Air quality and noise issues are considered in Chapters 12 and 11 of the EA Report. The potential for impact on health, wellbeing, and amenity is considered in EA Report Chapter 17. Customs issues would be dealt with at Port Botany.	671	**DoP Submission No 76**
pollution	noise, air and lighting pollution for nearby residents. We don't have to put the lights on in the area, that Is how much of a glow will come from it	The light spill impacts are considered in Chapter 16 of the EA Report. The proposed lighting would not be expected to change the night landscape as the lights would be focused downwards and would be part of a landscape already containing a large number of light sources. Lighting on site would be designed to meet AS4282 Control of Obtrusive Effects. Air quality and noise issues are considered in Chapters 12 and 11 of the EA Report. Pollution levels-air, noise and light spill will be unaffected by the ILC operation.	107	**DoP Submission No 68**
pollution	My husband and I purchased our home on Punchbowl Rd, Belfield 3 years ago and found that the noise and pollution is already terribly distressing.	Air quality and noise issues are considered in Chapters 12 and 11 of the EA Report. The potential for impact on health, wellbeing, and amenity is considered in EA Report Chapter 17.	681	**DoP Submission No 94**
pollution	If you had bothered to investigate properly and entered inside any house, flat or unit situated along Liverpool Rd South Strathfield, properties that back onto Centenary Drive West Strathfield,, Barker Rd, Newton Rd, Pemberton St and Ada Ave, Marlene Crescent and Davidson St, you would know that residents here are already bombarded day and night with noise light and fumes from passing traffic. Your proposal means that Enfield, Strathfield and Bankstown will be subjected to 100% of all noise, light and air pollution generated by intermodal activity because every car every truck every bus (for intermodla employees) and every train linked to intermodal activity must come to and through Enfield Strathfield and Bankstown.	Air quality and noise issues are considered in Chapters 12 and 11 of the EA Report. The potential for impact on health, wellbeing, and amenity is considered in Chapter 17. Traffic to and from the site during operation would be controlled through a Local Area Traffic Management Plan. Further details are provided in Chapter 7 of the EA Report.	736	**DoP Submission No 129,130**
pollution	There is no mention of provisions against the huge increase in noise, pollution and vibration that will directly affect all residents along the freight lines: The provision of noise walls or sound barriers along residential areas should appear as a reasonable minimum requirement if the project were to go ahead regardless of tax-payers' dissent.	The increases addressed in the EA are not huge. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	788	**DoP Submission No 112**

Issue Category	Comments	Response	Stakeholder ID	Name
pollution	I object to the proposal to build a port at Enfield because of pollution	Air quality and noise issues are considered in the EA Report, Chapters 12 and 11. The potential for impact on health, wellbeing, and amenity is considered in Chapter 17 of the EA Report. Traffic to and from the site during operation would be controlled through a Local Area Traffic Management Plan. Further details are provided in Chapter 7 of the EA Report.	583	**DoP Submission No 1**
pollution	We are very concerned about our family's safety and health due to the high levels of truck movement, queuing and pollution.	Air quality and noise issues are considered in Chapters 12 and 11. The potential for impact on health, wellbeing, and amenity is considered in Chapter 17. Traffic to and from the site during operation would be controlled through a Local Area Traffic Management Plan. Further details are provided in Chapter 7.	792	**DoP Submission No 116**
pollution	Light spill at night, is also of concern.	The light spill impacts are considered in Chapter 16. The proposed lighting would not be expected to change the night landscape as the lights would be focused downwards and would be part of a landscape already containing a large number of light sources. Lighting on site would be designed to meet AS4282 Control of Obtrusive Effects.	447	**DoP Submission No 315,158**
pollution	We oppose the proposal as we already have trucks and semis at the moment and do not which (sic) to increase more pollution and noise	Air quality and noise issues are considered in Chapters 12 and 11. The potential for impact on health, wellbeing, and amenity is considered in Chapter 17. Traffic to and from the site during operation would be controlled through a Local Area Traffic Management Plan. Further details are provided in Chapter 7.	796	**DoP Submission No 169**
pollution	With 24/7 use residents will be greatly affected by a huge increase pollution - lights	Site operations, including lighting issues would be controlled through an operation environmental management plan. Details are provided in Chapter 21. The light spill impacts are considered in Chapter 16. The proposed lighting would not be expected to change the night landscape as the lights would be focused downwards and would be part of a landscape already containing a large number of light sources. Lighting on site would be designed to meet ASNZS4282 Control of Obtrusive Effects.	798	**DoP Submission No 174**
pollution	You can't even imagine how much noise, dust, vibration, pollution will be experienced by us. Even before the actual functioning starts, there will be so much construction traffic that our life would be made hell.	A series of environmental management measures are to be implemented during construction to avoid or minimise potential negative impacts. These are detailed in Chapter 21.	542	**DoP Submission No 122**
pollution	The development could cause many hazardous implications such as: visual impact within the residential suburb of Greenacre and Environs	Changes to the visual environment are considered in Chapter 16. The landscape plan will be further developed during detailed design.	810	**DoP Submission No 168**

Issue Category	Comments	Response	Stakeholder ID	Name
pollution	I urge the State Government to reconsider this infrastructure development proposal. I do not want an Inter-modal Logistics Centre in Enfield or the resulting damage to the environment and increase in pollution, traffic congestion and the consequent effect on the health of residents	Noted	811	**DoP Submission No 125**
pollution	The proposal will result in increased pollution	Pollution levels-air, noise and light spill will be unaffected by the ILC operation.	45	**DoP Submission No 179**
pollution	Street lighting along the Hume Hwy and lighting of the existing site already create an aurora effect which can be seen for some kilometres away. If the terminal is to operate 24/7 then site lighting at 25m high must add to this effect, despite protestations to the contrary in the EA	The light spill impacts are considered in Chapter 16. The proposed lighting would not be expected to change the night landscape as the lights would be focused downwards and would be part of a landscape already containing a large number of light sources. Lighting on site would be designed to meet ASNZS4282 Control of Obtrusive Effects.	817	**DoP Submission No 120, 181**
pollution	People will be forced to move away from the railway yard lights, lighting the sky throughout the night.	The light spill impacts are considered in Chapter 16. The proposed lighting would not be expected to change the night landscape as the lights would be focused downwards and would be part of a landscape already containing a large number of light sources. Lighting on site would be designed to meet AS4282 Control of Obtrusive Effects.	828	**DoP Submission No 182**
pollution	Further, within the Environmental Assessment itself, there is no mention of provisions to guard against the huge increase in noise, pollution and vibration that will directly affect myself and other residents living near the freight line in Marrickville. The provision of noise walls or sound barriers etc along residential areas appears to be a reasonable minimum requirement should your project go ahead regardless of tax payers' dissent.	Noted. The increases addressed in the EA are not huge The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	831	**DoP Submission No 316**
pollution	I urge the State Government to reconsider this infrastructure development proposal. I do not want an Inter-modal Logistics Centre in Enfield or the resulting damage to the environment and increase in pollution and traffic congestion.	Noted	789	**DoP Submission No 113**
pollution	The residents on Roberts Rd and surrounding streets would have to endure the noise from thousands of big semis 24 hours a day 7 days a week for ever	Traffic noise was addressed in Chapter 11. The traffic generated by the ILC will not cause any significant increase in traffic noise. A Local Area Traffic Management Plan will be implemented during operation. This will prevent the use of residential streets by trucks.	843	**DoP Submission No 167**

Issue Category	Comments	Response	Stakeholder ID	Name
pollution	There will be a great deal of truck and train traffic with the associated noise and air pollution	Noise effects from site operation will be managed to an acceptable level. Issues would be addressed in more detail through the Environmental Noise Management Plan. Traffic noise was addressed in Chapter 11. The traffic generated by the ILC will not cause any significant increase in traffic noise. Noted. The appropriate approach to the management of effects from the rail freight line is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	840	**DoP Submission No 322**

Issue Category	Comments	Response	Stakeholder ID	Name
Property Impact	We believe the location of the proposed Centre is extremely inappropriate. This is a major concern as we know our Property's price value will dramatically decrease due to increased traffic and noise.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17. /	792	**DoP Submission No 116**
Property Impact	Project will devalue the real estate in the area.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	589	**DoP Submission No 9**
Property Impact	Property values will decline in a very small space of time, as a result stemming of increased traffic and noise along this corridor.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	598	**DoP Submission No 22**
Property Impact	All of the negative impacts are likely to decrease property values. What compensation is being considered under these circumstances?	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	631	**DoP Submission No 42**
Property Impact	If this monster is allowed to take up residency in my backyard our property values will decrease immediately	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	512	**DoP Submission No 45**
Property Impact	Why cause disruption and decreased land values in residential areas.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	638	**DoP Submission No 61**
Property Impact	loss of property values	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	107	**DoP Submission No 68**
Property Impact	I feel we will be terribly ripped off if Port Enfield is approved as our home value will decrease and all our hard work to make our house a home has been a waste., we can not afford to move elsewhere as we have the next 27 years of mortgage to pay off.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	681	**DoP Submission No 94**
Property Impact	Concern about low property value	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	588	**DoP Submission No 7**

Issue Category	Comments	Response	Stakeholder ID	Name
Property Impact	All of these outlined negative impacts are likely to decrease property values. What compensation is being considered under these circumstances?	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	786	**DoP Submission No 106**
Property Impact	Dramatic increases in the number of trucks (an extra 900 semi-trailers / day) going along our roads and rail to and around from the site as under the proposal will result in more traffic, more pollution, more noise, increased risk of road accidents and loss of property values.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	794	**DoP Submission No 117**
Property Impact	The development could cause many hazardous implications such as: lowering of property values	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	810	**DoP Submission No 168**
Property Impact	The proposal will result in loss of property values	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	45	**DoP Submission No 179**
Property Impact	• Effects on property value. Proximity to an industrial development of this size, particularly if such development has negative effects in terms of noise, pollution, access etc is not conducive to the maintenance and growth of property value. Governments must be aware that interference with expectations with respect to property value is seen as inequitable and unjust.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	817	**DoP Submission No 120,181**
Property Impact	Apart from the changes to our environment this proposal will cause our property will lose value as we try to sell out and escape this mess at a time when fewer people will be in the market to buy in this area.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	828	**DoP Submission No 182**
Property Impact	Additional traffic will increase noise levels and devalue property prices.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	726	**DoP Submission No 12,178,172**
Property Impact	This proposal will not only reduce the monetary value of our home but also our peaceful way of life.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details in relation to socio economic impacts and amenity are provided in Chapter 17.	840	**DoP Submission No 322**

Issue Category	Comments	Response	Stakeholder ID	Name
Property Impact	By virtue of its 24/7 operation (one train every 7 minutes) the proposal will have a deleterious affect on my parents property values		856	**DoP submission number 329**

Issue Category	Comments	Response	Stakeholder ID	Name
Rail Issues	The Environmental Assessment does not include any information on the environmental impacts from the increase in train numbers on the freight line as a result of this proposal and the ongoing expansion of Port Botany.	Rail noise and air quality impacts are addressed in Chapters 11 and 12 of the EA report. The appropriate approach to the management of effects from the rail freight line system is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	831	**DoP Submission No 316**
Rail Issues	The Environmental Assessment does not include any information on the environmental impacts from the increase in train numbers on the freight line as a result of this proposal and the ongoing expansion of Port Botany.	See above	807	**DoP Submission No 156**
Rail Issues	The Environmental Assessment does not include any information on the environmental impacts from the increase in train numbers on the freight line as a result of this proposal and the ongoing expansion of Port Botany. No to more trains.	See above	806	**DoP Submission No 152**
Rail Issues	The Environmental Assessment does not include any information on the environmental impacts from the increase in train numbers on the freight line as a result of this proposal and the ongoing expansion of Port Botany.	See above	805	**DoP Submission No 124**
Rail Issues	And they are very many people who will be grossly affected by the proposal's increase in freight-traffic; not merely those living right next to the freight-lines, but all people living in close proximity to them. Yet the proposal's Environmental Assessment includes no information whatsoever regarding environmental impacts from the increase in freight-traffic.	See above	788	**DoP Submission No 112**
Rail Issues	The residents of Belfield have to contend not only with increased vehicular traffic but also rail traffic. Some of these freight trains can be nearly 2km long and although the tracks have been upgraded, the noise and vibrations when the trains are passing through or are stationary and the locomotives idling is significant.	See above	524	**DoP Submission No 110**
Rail Issues	There would be a 220% increase in the number of trains using freight lines. However, rail impacts were downplayed throughout the Port Botany Expansion EIS, with negative impacts of moving more than a million containers by rail through the residential suburbs of Southern Sydney hardly mentioned at all. The EIS relied on previous reports or did not assess impacts along 90% of the rail line to Enfield! This shows the disdain with which the residents along the freight rail corridors are being treated at Sydenham, Marrickville, Hurlstone Park, Campsie, Belfield, Enfield, Chullora and on through Sefton, Chester Hill, Villawood, Cabramatta - Liverpool - Casula - Glenfield – Macquarie Fields - Ingleburn and on to Macarthur. Most of them have	See above Trains to and from the ILC will be no more than 20 per day and in any case the 20 movements will occur whether or not the ILC at Enfield is constructed.	30	**DoP Submission No 93**

Issue Category	Comments	Response	Stakeholder ID	Name
	no idea that for 24 hours/day 7 days/week, with no curfew, they will experience 7 mins headway between 600 m long freight trains rumbling and screeching past their homes			
Rail Issues	The EA does not include any information on the environmental impacts form the increase in train numbers on the freight line as a result of this proposal and the ongoing expansion of Port Botany	See above Trains to and from the ILC will be no more than 20 per day.	563	**DoP Submission No 95**
Rail Issues	Combining all the scenarios together. Cumulative effects. Expansion to Port Botany, Enfield upgrade, Moorebank proposal, Ingleburn, Brooks Road site, Marrickville Truck Tunnel, M4 extension and the East Hills rail line station upgrade to take trains that will travel from Botany to Glenfield in the west carrying double containers.	See above Trains to and from the ILC will be no more than 20 per day.	512	**DoP Submission No 45**
Rail Issues	It would appear that the centre will generate operations involving one train every seven minutes seven days a week. The trains quite obviously are large trains with a significant number of carriages of sorts. Each train as it moves past any designated point literally takes a couple of minutes to pass and in doing so creates a regular and continuous noise. Following its departure it is then only 5 minutes before this process is once again repeated.	See above. Trains to and from the ILC will be no more than 20 per day.	626	**DoP Submission No 36**
Rail Issues	With the freight rail corridor expecting 134 total movements per day, good trains will be passing adjacent homes every 10 minutes. The minister for Planning should impose limits on freight trains as to tonnage, speed frequency.	See above Trains to and from the ILC will be no more than 20 per day.	597	**DoP Submission No 21**
Rail Issues	Noise from trains. With extra loads, 2 sometimes 3 engines are put on with train lengths running into kms even past our homes. I believe it has been boasted that a train will run every 7 minutes, as more trains will be on the track it is inevitable that there will be hold ups. On a red light to entering the facility the screech of brakes is truly unbearable plus the clanging buffers- then the shuddering bang and reverse to start. However this is not constant but if this goes ahead it can only be the norm.	See above Trains to and from the ILC will be no more than 20 per day.	499	**DoP Submission No 10**
Rail Issues	We wish to ensure that any development of an ILC is connected by the existing freight line to the Sydney Harbour berths at White bay. The exhibited EA does not appear to deal with this issue. It is important to us, and to the community because White Bay wharves are the sole Harbour wharves capable of rail servicing with exiting infrastructure, and there appear to be no real opportunities for provision of additional rail infrastructure to other wharves. The 'working harbour' concept supports our view.	There is an existing freight line connection from Wardell Junction to Rozelle and White bay available for freight train operations	822	**DoP Submission No 43**

Issue Category	Comments	Response	Stakeholder ID	Name
	The freight line from White Bay joins the line to Botany bay between Hurlstone Park and Dulwich Hill stations; freight from White Bay would flow to the intermodal centre in harmony with that from Botany Bay.	Container and general cargo operations moved from White Bay to Darling Harbour in November 2003. There is no current lessee/operator utilising rail transport. However, new maritime uses may in future require rail transport from White Bay.		
Rail issues	• Enfield should be set up as a junction so that freight trains can be directed onto appropriate lines for delivery to M7 terminals and businesses. Surplus land could be sold off and the money raised added to the Freight Movements Management Fund as proposed in the FIAB Report.	Noted	447	**DoP Submission No 315,158**

Issue Category	Comments	Response	Stakeholder ID	Name
Reject Proposal	I wish to lodge my objection to the proposal.	Noted	623	**DoP Submission No 32**
Reject Proposal	My wife and I have been at the above address fro over 50 years and we wish to object to the proposed terminal on the Enfield Rail Yards site.	Noted	625	**DoP Submission No 33**
Reject Proposal	We at 12 Ivy St, Greenacre OPPOSE the building of the Intermodal Logistics Centre at Enfield	Noted	629	**DoP Submission No 38,101**
Reject Proposal	I hereby strongly object to the proposal of the building of an intermodal freight terminal at Enfield by Sydney Ports Corporation. Putting it simply I do not want to have the proposed intermodal freight terminal build near where I live.	Noted	630	**DoP Submission No 39,98**
Reject Proposal	As I live 700-800 metres as the crow flies east of the site of the ILC at Enfield, I feel that I must lodge my form of submission/objection	Noted	512	**DoP Submission No 45**
Reject Proposal	I fully object to the Enfield Intermodal Logistics Centre Proposal	Noted	618	**DoP Submission No 26**
Reject Proposal	I strongly object to this proposal. Today most of the inner west region of Sydney is residential.	Noted	649	**DoP Submission No 65**
Reject Proposal	I am writing to express my concern about the current proposal by Sydney Ports Corporation for the development of the planned Enfield Intermodal Logistics Centre at the former Enfield Marshalling Yards site.	Noted	681	**DoP Submission No 94**
Reject Proposal	I object to the proposal to build a port at Enfield	Noted	583	**DoP Submission No 1**

Issue Category	Comments	Response	Stakeholder ID	Name
Reject Proposal	I would like to object to this proposed undertaking on the grounds of more noise and air pollution	Noted	593	**DoP Submission No 16**
Reject Proposal	I object most vehemently to the above proposal going ahead.	Noted	585	**DoP Submission No 3**
Reject Proposal	I would like to add my protest to this proposal. I am not happy for this project to go ahead in its present form.	Noted	587	**DoP Submission No 5**
Reject Proposal	I wish to lodge an appeal against the facility	Noted	499	**DoP Submission No 10**
Reject Proposal	I strongly object to the development of Enfield Port development	Noted	588	**DoP Submission No 7**
Reject Proposal	I object to the proposed Intermodal Logistics Centre-Enfield	Noted	589	**DoP Submission No 9**
Reject Proposal	I personally object to the container in this area.	Noted	594	**DoP Submission No 17**
Reject Proposal	We strongly object to this proposal. Please reconsider	Noted	595	**DoP Submission No 18**
Reject Proposal	I strongly object to the freight terminal at Enfield as proposed by Sydney Ports	Noted	596	**DoP Submission No 19**

Issue Category	Comments	Response	Stakeholder ID	Name
Reject Proposal	I wish to voice my objection to the proposed Enfield Intermodal Logistics Centre Application ref no 05-0147	Noted	563	**DoP Submission No 95**
Reject Proposal	My family and I strongly oppose the application due to many reasons	Noted	591	**DoP Submission No 14**
Reject Proposal	I oppose the State Government's plans to establish a container terminal and logistics centre at Enfield to support the expansion of Port Botany.	Noted	811	**DoP Submission No 125**
Reject Proposal	I am writing on behalf of my wife and myself to protest the "proposed intermodal logistics centre - Enfield"	Noted	802	**DoP Submission No 118**
Reject Proposal	I am 100% opposed to this project.	Noted	804	**DoP Submission No 155**
Reject Proposal	I wish to voice my objection to the proposed Enfield Intermodal Logistics Centre application ref.no.05-0147.	Noted	805	**DoP Submission No 124**
Reject Proposal	I wish to voice my objection to the proposed Enfield Intermodal Logistics Centre, application ref.no.05-0147.	Noted	806	**DoP Submission No 152**
Reject Proposal	Thanks for writing to me and sending the brochure for the above. First of all I must again tell you that the idea of making a port similar to Port botany is absolutely preposterous, silly and impractical idea. Whatever conclusions SKM has made and provided in the brief are done by people sitting behind desks and based on absolute presumptions.	Noted	542	**DoP Submission No 122**
Reject Proposal	I am writing about the Sydney Ports Project - I am against it.	Noted	812	**DoP Submission No 133**

Issue Category	Comments	Response	Stakeholder ID	Name
Reject Proposal	I wish to express my opposition to the proposed ILC at Enfield	Noted	813	**DoP Submission No 176**
Reject Proposal	I wish to express my opposition to the proposed ILC at Enfield	Noted	813	**DoP Submission No 176**
Reject Proposal	I wish to voice my objection to the proposed Enfield Intermodal Logistics Centre, application ref.no.05-0147.	Noted	807	**DoP Submission No 156**
Reject Proposal	I wish to voice my objection to the proposed Enfield Intermodal Logistics Centre. Application ref.no. 05-0147.	Noted	831	**DoP Submission No 316**
Reject Proposal	We would like to submit our strong objection into the Sydney Ports for the Freight Terminal at Enfield.	Noted	706	**DoP Submission No 77**
Reject Proposal	We are writing to inform that we strongly object to the Intermodal Freight Terminal being constructed at the old Enfield Rail Marshalling Yards.	Noted	711	**DoP Submission No 69**
Reject Proposal	Proposal not supported	Noted	787	**DoP Submission No 109**
Reject Proposal	I sincerely object to the proposed Enfield Intermodal Logistics Centre	Noted	788	**DoP Submission No 112**
Reject Proposal	I again need to put pen to paper about the ILC at Enfield after several previous letters and attending the recent protest meetings	Noted	87	**DoP Submission No 102**

Issue Category	Comments	Response	Stakeholder ID	Name
Reject Proposal	We, the Abboud Household of 10 Wentworth Street Greenacre, write to Inform you of our strong objection to the Proposed Intermodel Logistics Centre at Enfield - Application Q5JD147.	Noted	792	**DoP Submission No 116**
Reject Proposal	We strongly oppose the construction of the proposed Intermodal Logistics Centre at Enfield	Noted	795	**DoP Submission No 161**
Reject Proposal	I am making this submission on behalf of the Summer Hill-Ashfield greens, a group with members residing in the Strathfield, Burwood ,Canada Bay and Ashfield Council areas. The Summer Hill-Ashfield Greens object to the above proposal for the reasons outlined below.- traffic air noise	Noted	686	**DoP Submission No 73**
Reject Proposal	I am writing to voice my concerns about having the Enfield ILC at Enfield. As I am a resident of Jean St, Greenacre, located in the vicinity of your development, I am concerned about the development's impact and the impact of traffic flow on our street and general area.	Concerns regarding Jean St noted. Traffic during operation would be controlled through a Local Area Traffic Management Plan. Other measures to mitigate impacts are provided in Chapter 7 of the EA report.	633	**DoP Submission No 46**
Reject Proposal	am writing to voice my concerns about having the Enfield ILC at Enfield. As I am a resident of Jean St, Greenacre, located in the vicinity of your development, I am concerned about the development's impact and the impact of traffic flow on our street and general area.	Concerns regarding Jean St noted. Traffic during operation would be controlled through a Local Area Traffic Management Plan. Other measures to mitigate impacts are provided in Chapter 7 of the EA report.	642	**DoP Submission No 62**
Reject Proposal	am writing to voice my concerns about having the Enfield ILC at Enfield. As I am a resident of Jean St, Greenacre, located in the vicinity of your development, I am concerned about the development's impact and the impact of traffic	Concerns regarding Jean St noted. Traffic during operation would be controlled through a Local Area Traffic Management Plan. Other measures to mitigate impacts are provided in Chapter 7 of the EA report.	646	**DoP Submission No 62**
Reject Proposal	We are writing to express our opposition to the development of an ILC at Enfield. We believe that such a facility will impact in a serious and negative manner on the quality of life of local residents, as well as creating financial problems for local councils and traffic difficulties for Sydney itself.	Noted. Traffic during operation would be controlled through a Local Area Traffic Management Plan. Amenity, quality of life and wellbeing are addressed in Chapter 17.	626	**DoP Submission No 36**
Reject Proposal	I am writing to express my strong objection to the proposal by Sydney Ports Corporation for the development of an Intermodal Logistics Centre at the former Enfield Marshalling Yards. My objections are based on: - High population density of the area and surrounds - Hume Highway congestion - Schools along Hume Highway, and surrounds - Pollution from trucks and trains - Infestation from proposed storage areas - Noise - cacophony from trucks, trains, etc.	Noted. The land use immediately surrounding the site is predominantly industrial as described in Chapter 14. Traffic issues are further considered in Chapter 7 and a Local Area Traffic Management Plan is to be prepared during detailed design. Noise and Air Quality (from trucks and trains) is assessed in Chapter 11 and 12. Customs issues are to be dealt with at Port Botany.	671	**DoP Submission No 76**

Issue Category	Comments	Response	Stakeholder ID	Name
Reject Proposal	I am writing to express my strong objection to the proposal by Sydney Ports Corporation for the development of the Enfield Intermodal Logistics Centre at the former Enfield Marshalling Yards surrounded by thickly populated Inner West residential suburbs of Greenacre, Lakemba, Belmore, South Strathfield, Strathfield and Chullora	Noted. The land use immediately surrounding the site is predominantly industrial as described in Chapter 14. Socio economic issues are considered in Chapter 17.	107	**DoP Submission No 68**
Reject Proposal	Please accept this letter outlining our objection to the proposed ILC at Enfield. We believe that if this development were to go ahead, our local area would be severely impacted.	Noted Amenity issues are considered in Chapter 17.	631	**DoP Submission No 42**
Reject Proposal	I strongly object to the proposed intermodal logistics Centre at Enfield App 05.0147. We are talking here about a big change in the area, so I strongly object to that propose plan on that big scale to be done	Noted Amenity issues are considered in Chapter 17.	584	**DoP Submission No 2**
Reject Proposal	I am objecting to the proposal because of traffic movements	Noted. Traffic issues have been addressed in Chapter 7. Traffic movements during operation would be controlled through the Local Area Traffic Management Plan.	590	**DoP Submission No 11**
Reject Proposal	I am really opposed of you not considering and understanding our case. Find somewhere else for your trucks.	Noted. Traffic issues have been addressed in Chapter 7. Traffic movements during operation would be controlled through the Local Area Traffic Management Plan. Alternative sites are reviewed in Chapter 3.	622	**DoP Submission No 31,100**
Reject Proposal	I wish to object to the proposal because of noise and traffic	Noted. Noise issues are considered in Chapter 11 and Traffic within Chapter 7. Management measures are proposed during construction and operation to minimise the impact to local residents.	592	**DoP Submission No 15**
Reject Proposal	I am writing to voice my concerns of having the Enfield Intermodal Logistic Terminal at Enfield. As I am a resident of Jean St Greenacre located in the vicinity of your development, I am concerned the above environmental impact, and the traffic flow this will have on our street and general area.	Concerns regarding Jean St noted. Traffic during operation would be controlled through a Local Area Traffic Management Plan. Other measures to mitigate impacts are provided in Chapter 7 of the EA report.	620	**DoP Submission No 27,306**
Reject Proposal	Strongly objects to proposal, concern about traffic , noise and decreasing property values	Noted. Noise issues are considered in Chapter 11, Traffic within Chapter 7 and property impacts in Chapter 17. Management measures are proposed during construction and operation to minimise the impact to local residents.	598	**DoP Submission No 22**
Reject Proposal	The purpose of this letter is to notify you of our objection to the ILC Enfield development. The issue we are concerned with is noise. We urge the NSW Government not to approve the development and find a suitable site with less impacts on established residential areas.	Noise issues have been addressed in Chapter 11. Noise mitigation measures have been proposed and are to be further developed during detailed design. Construction and Operation Environmental Management Plans are to be implemented to minimise the potential for negative impacts. Alternative sites are reviewed in Chapter 3.	599	**DoP Submission No 23**

Issue Category	Comments	Response	Stakeholder ID	Name
Reject Proposal	I am opposed to the Sydney Ports Project for Enfield as the noise from heavy vehicles plus the pollution will affect our health and well being.	Traffic issues are further considered in Chapter 7 and a Local Area Traffic Management Plan is to be prepared during detailed design. Noise and Air Quality (from trucks and trains) is assessed in Chapter 11 and 12.	93	**DoP Submission No 25**
Reject Proposal	In light of the cost to our community versus any benefit from this proposal I formally register my opposition to this project.	Noted.	801	**DoP Submission No 149,183**
Reject Proposal	This is to object to the proposal on the following grounds, consultation process and safety.	Noted	621	**DoP Submission No 29,72**
Reject Proposal	My submission to be considered as an objection to the proposed Sydney Ports terminal at Enfield. As further it's potential to impact on the Bankstown Council area and in particular within the roads of the residential suburbs of Greenacre, which I feel would be bounded by this development.	Noted. Traffic issues are further considered in Chapter 7 and a Local Area Traffic Management Plan is to be prepared during detailed design.	810	**DoP Submission No 168**
Reject Proposal	We oppose the proposal as we already have trucks and semis at the moment and do not which (sic) to increase more pollution and noise	Noted. Traffic issues are further considered in Chapter 7 and a Local Area Traffic Management Plan is to be prepared during detailed design.	796	**DoP Submission No 169**
Reject Proposal	We are opposed to the development. This proposal is unacceptable. There is little regard to the impact on residential areas. Sydney Airport hours of operation are restricted and a curfew imposed.	Noted. The ILC is to operate 24 hours a day 7 days a week. Measures to minimise impacts during operation are to be managed through an Operation Environmental Management Plan.	31	**DoP Submission No 136**
Reject Proposal	I am again writing to express my strong objection to the proposal by Sydney Ports Corporation for the development of the Enfield Intermodal Logistics Centre at the former Enfield Marshalling Yards. The site is bounded by the suburbs of Greenacre, Lakemba, Belmore, Belfield, South Strathfield, Strathfield and Chullora and the impacts on these immediate areas would be extremely unfavourable. Any use of the Enfield Marshalling Yards as a freight terminal should not be approved. The site is completely unsuitable for such a facility given its proximity to residential areas and the adverse community and environmental impacts the redevelopment would create.	Noted.	45	**DoP Submission No 179**
Reject Proposal	The Environmental Assessment in fact demonstrates and quite convincingly, that there are significant and intractable existing or emerging problems in the area bounding the proposed site, particularly with respect to the operation of the road network, critical intersection capacity, noise criteria and ajr quality. The general conclusion of the EA is, however, that whatever additional impact the proposed	Noted.	817	**DoP Submission No 120,181**

Issue Category	Comments	Response	Stakeholder ID	Name
	Intermodal Terminal may have on the locality would be, in relative terms, "minimal". This reasoning not only defies logic, but is contrary to all sensible planning practice. Futhermore for a project with an underpinning economic objective to ignore externalities such conclusions are severely flawed			
Reject Proposal	The comments about traffic above are just a small part of the number of overall objections we have to the Enviromental Asssessment for the Intermodal Logistics Centre at Enfield. We feel it necessary to register our objections to this project, and the primary object of this submission is to state just a few of these concerns. Our main thrust is clearly towards the problem of traffic congestion.	Noted. Traffic issues are further considered in Chapter 7 and a Local Area Traffic Management Plan is to be prepared during detailed design.	834	**DoP Submission No 319**
Reject Proposal	I urge the State Government to reconsider this infrastructure development proposal. I do not want an Inter-modal Logistics Centre in Enfield or the resulting damage to the environment and increase in pollution and traffic congestion.	Noted.	789	**DoP Submission No 113**
Reject Proposal	Completely object to the proposed Intermodal Logistics Centre - Enfield. The reason is - there will be more pollution in our area - there will be more traffic in our local area - More trains will be passing behind my backyard (especially at night) - I am a pensioner and I think my health will be affected.	Noted. Traffic issues are further considered in Chapter 7 and a Local Area Traffic Management Plan is to be prepared during detailed design. Noise and Air Quality (from trucks and trains) is assessed in Chapter 11 and 12. Health and wellbeing is considered in Chapter 17.	716	**DoP Submission No 70**
Reject Proposal	We object vehemently to the abovementioned proposal of SPC because of the adverse effect it will have on Enfield and its surrounding suburban residential zones.	Noted.	736	**DoP Submission No 129,130**
Reject Proposal	In relation to an intermodal terminal at Enfield, there are no good environmental or social or even sound economic reasons to go ahead with this development. The fact that previous proposals have either "fallen over" or been rejected in previous reviews is demonstrative of the fact that these reviews have recognised that there are good reasons for intermodal terminal proposals at Enfield to be rejected. It's time the concept of an intermodal terminal at Enfield was rejected once and for all.	Noted.	30	**DoP Submission No 93**
Reject Proposal	Please accept this letter outlining our objection to the proposed Intermodal Logistics Centre (ILC) at Enfield. We believe that if this development were to go ahead, our local area would be severely impacted.	Noted.	786	**DoP Submission No 106**
Reject Proposal	I am angry and ask you to cancel the Sydney Ports Enfield Intermodal Proposal. For us living in this area it would be just the limit more noise, more traffic and more inconvenience.	Noted.	799	**DoP Submission No 139**

Issue Category	Comments	Response	Stakeholder ID	Name
Reject Proposal	In view of my grave concerns and other residents strong and grave concerns about this gross overdevelopment at Port Enfield I submit that this proposal be again totally ejected and another intermodal sites be developed around Sydney. Create jobs in Sydney's west not in the inner west.	Noted.	798	**DoP Submission No 174**
Reject Proposal	We would like you to note that we object to the proposed ILC Enfield and that we were not included in the community consultation processes of the 2001 consultative phase, the Milton Morris Review or the 2004 Stolznow research.	Noted.	790	**DoP Submission No 137**
Reject Proposal	I object to the above on the basis of its nature, size, (present and future) and its position in relation to the environment in which it is situated and I object to having to object once again to this proposal. It will be a large and noisy traffic generating development right in the centre of suburban western Sydney between Belfield, South Strathfield and Greenacre suburbs where a lot of people live and work and where there is already a great deal of through traffic	Noted.	793	**DoP Submission No 147**
Reject Proposal	I am writing to express my strong objection to the proposal by Sydney Ports Corporation for the development of the Enfield Intermodal Logistics Centre at the former Enfield Marshalling Yards surrounded by the thickly populated Inner West residential suburbs of Greenacre, Lakemba, Belmore, South Strathfield, Strathfield and Chullora	Noted. The land use immediately surrounding the site is predominantly industrial as described in Chapter 14. Socio economic issues are considered in Chapter 17.	794	**DoP Submission No 117**
Reject Proposal	I hereby formally lodge my objection to this development due to the adverse social, environmental and economic impacts the development would have on the Strathfield Local Government Area.	Noted	838	**DoP Submission No 173,150**
Reject Proposal	I am writing to express my complete and total opposition to the proposal by SPC for the development of the Enfield Intermodal Logistics Centre to be established at the former Enfield Marshalling Yards.	Noted.	840	**DoP Submission No 322**
Reject Proposal	I strongly object to the proposed terminal at Enfield	Noted.	841	**DoP Submission No 323**
Reject Proposal	I strongly object to the proposed terminal at Enfield	Noted.	66	**DoP Submission No 324**
Reject Proposal	I strongly object to the logistics terminal at Enfield	Noted.	842	**DoP Submission No 325**

Issue Category	Comments	Response	Stakeholder ID	Name
Reject Proposal	I object to the proposed terminal at Enfield	Noted.	843	**DoP Submission No 167**
Reject Proposal	I wish to state my opposition to the proposed ILC development as the area has now reached saturation point. As a resident of Belfield for more than 25 years, I have/ witnessed enormous change in the neighbourhood - not all for the best!	Noted.	524	**DoP Submission No 110**
Reject Proposal	I am writing on behalf of the Georges hall Branch of the ALP. We are deeply concerned at the proposal to develop the Enfield Intermodal Logistics Centre at the old Enfield Marshalling Yard site.	Noted	865	**DoP submission number 330**

Issue Category	Comments	Response	Stakeholder ID	Name
Safety	Enfield and surrounding areas are predominantly residential this will result in a number of detrimental effects including a risk to local pedestrians.	Pedestrian safety is not identified as a problem on the roads adjoining the ILC. Nevertheless pedestrian safety would be considered during preparation of the Local Area Traffic Management Plan.	786	**DoP Submission No 106**
Safety	My concern is that the local schools will suffer along with our children as the roads will become dangerous for children	Pedestrian safety is not identified as a problem on the roads adjoining the ILC. Nevertheless pedestrian safety would be considered during preparation of the Local Area Traffic Management Plan	591	**DoP Submission No 14**
Safety	The freight terminal will concentrate truck numbers and movements in our local community resulting in more serious accidents involving large vehicles. The danger that the increased number of trucks pose on our streets is unacceptable.	Crash data was reviewed during preparation of the EA report. Further details are contained in Chapter 7 and Appendix B. Pedestrian safety would be a key consideration during preparation of the Local Area Traffic Management Plan. SPC also proposes intersection improvements at Norfolk/Roberts to ensure safe operation of this intersection	596	**DoP Submission No 19**
Safety	The concern re the huge number of car accidents that occur on the intersection of Roberts Rd and Norfolk Rd already. This is a well known black spot area. There has been many people killed at this intersection. With the extra huge amount of daily truck movements, the proposed terminal would bring, the potential for more accidents to occur is a worrying possibility	Crash data was reviewed during preparation of the EA report. Further details are contained in Chapter 7 and Appendix B. Pedestrian safety would be a key consideration during preparation of the Local Area Traffic Management Plan	630	**DoP Submission No 39,98**
Safety	The building of the ILC is substantial and will result in a large increase in semi trailer truck movements in the Enfield area. Since the Enfield and surrounding areas are predominantly residential, this will result in a number of detrimental effects including a risk to local pedestrians.	ILC operation traffic impacts have been modelled, further details are provided in Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with due consideration of pedestrian safety.	631	**DoP Submission No 42**
Safety	Perish the thought that there should ever be a disaster in this area- and/or that I should urgently need an ambulance. Has a critical incident plan been worked out?	An Emergency Response and Incident Management Plan would be prepared for the site. Emergency vehicle access would also be considered during preparation of the Local Area Traffic Management Plan.	649	**DoP Submission No 65**
Safety	increased risk of road accidents	Crash data was reviewed during preparation of the EA report. Further details are contained in Chapter 7 and Appendix B. Pedestrian safety would be a key consideration during preparation of the Local Area Traffic Management Plan	107	**DoP Submission No 68**
Safety	There are issues of public safety, health and community rights which have not been properly addressed	Crash data was reviewed during preparation of the EA report. Further details are contained in Chapter 7 and Appendix B. Pedestrian safety would be a key consideration during preparation of the Local Area Traffic Management Plan	621	**DoP Submission No 29,72**

Issue Category	Comments	Response	Stakeholder ID	Name
Safety	Dramatic increases in the number of trucks going along odour roads and rail to and from the site as under the proposal will result in more traffic, more pollution more noise , increased risk of road accidents and increased health risks.	ILC operation traffic impacts have been modelled, further details are provided in Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with due consideration of pedestrian safety. Potential impacts in relation to noise, air quality and health are further considered in Chapters 11, 12 and 17.	713	**DoP Submission No 138,140,143,119**
Safety	Project will increase accidents	Crash data was reviewed during preparation of the EA report. Further details are contained in Chapter 7 and Appendix B. Further consideration of safety issues would be undertaken during preparation of the Local Area Traffic Management Plan	589	**DoP Submission No 9**
Safety	Police records will show that many many accidents occur at the corner of Hume Hwy and Wallis Ave South Strathfield, and at the corner of the Hume Hwy and Cosgrove Rd. Any increase in vehicular activity generated by the Intermodal will exacerbate these problems and totally destroy any quality of life residents in these areas have left.	Crash data was reviewed during preparation of the EA report. Further details are contained in Chapter 7 and Appendix B. Further consideration of safety issues would be undertaken during preparation of the Local Area Traffic Management Plan Amenity and quality of life is further considered in Chapter 17.	736	**DoP Submission No 129,130**
Safety	The increasing amount of traffic already evident has made Roberts Rd a very dangerous Rd. Very frequently we witness major accidents and loss of lives because of the traffic and speeding drivers. The heavy traffic already makes it very difficult and dangerous when exiting our driveways. To build a freight terminal in Enfield will lead to increased traffic, a more dangerous road and worse conditions for residents, drivers and the neighbouring schools in the areas.	ILC operation traffic impacts have been modelled, further details are provided in Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety the key consideration. Crash data was reviewed during preparation of the EA report. Further details are contained in Chapter 7 and Appendix B.	829	**DoP Submission No 245**
Safety	We are very concerned about our family's safety and health due to the high levels of truck movement, queuing and pollution.	ILC operation traffic impacts have been modelled, further details are provided in Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety as the key consideration. Crash data was reviewed during preparation of the EA report. Further details are contained in Chapter 7 and Appendix B. Noise and air quality are further considered in Chapters 11 and 12 of the EA Report.	792	**DoP Submission No 116**
Safety	Dramatic increases in the number of trucks (an extra 900 semi-trailers / day) going along our roads and rail to and around from the site as under the proposal will result in more traffic, more pollution, more noise, increased risk of road accidents and loss of property values.	ILC operation traffic impacts have been modelled, further details are provided in Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety as the key consideration. Crash data was reviewed during preparation of the EA report. Further details are contained in Chapter 7 and Appendix B. Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal, there are no reasons why the proposal would affect local property prices.	794	**DoP Submission No 117**

Issue Category	Comments	Response	Stakeholder ID	Name
Safety	The purpose of this submission is to object to the proposal. Reasons for the objection of this proposal include potential increase in accidents and light spills from trucks	ILC operation traffic impacts have been modelled, further details are provided in Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety as the key consideration. Crash data was reviewed during preparation of the EA report. Further details are contained in Chapter 7 and Appendix B.	803	**DoP Submission No 153**
Safety	Since the Enfield and surrounding areas are predominantly residential, this will result in a number of detrimental effects including, noise pollution, air pollution and a risk to local pedestrians.	ILC operation traffic impacts have been modelled, further details are provided in Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety as the key consideration. Noise and air quality are assessed in Chapter 11 and 12.	809	**DoP Submission No 123**
Safety	Hazardous substances such as diesel and LPG will be stored on sight to pose a significant threat to the local community.	A Preliminary Hazard Assessment for the proposal was conducted. Further details are provided in Chapter 20. All fuel stored on site would be undertaken with due consideration of the potential risks, to be determined during the detailed design. An Emergency Response and Incident Management Plan would also be prepared for the site.	813	**DoP Submission No 176**
Safety	Apart from economic and health issues, there is an issue of national security. It is not a good idea to store fuel on site near a residential area. It was fortunate the fire at Port Botany (in 2005) did not injure or harm lives as it was far from a residential area. It is proposed that fuel be not stored on site.	A Preliminary Hazard Assessment for the proposal was conducted. Further details are provided in Chapter 20. All fuel stored on site would be undertaken with due consideration of the potential risks, to be determined during the detailed design. An Emergency Response and Incident Management Plan would also be prepared for the site	814	**DoP Submission No 135**
Safety	The proposal will result in increased risk of road accidents	ILC operation traffic impacts have been modelled, further details are provided in Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety as the key consideration. Crash data was reviewed during preparation of the EA report. Further details are contained in Chapter 7 and Appendix B.	45	**DoP Submission No 179**
Safety	The EA details the accident history in the study area.(p30 FTWPaper) It is suggested that this study area is far too limited to be indicative of road safety issues. Although the study is limited, the statistics speak volumes- over a 5 year period 1213 accidents reported 559 of these injuring. There is no detail of breakdowns and traffic delays caused by both accidents and breakdowns which is a critical factor in efficiency of the road network.	ILC operation traffic impacts have been modelled, further details are provided in Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety as the key consideration. Crash data was reviewed during preparation of the EA report. Further details are contained in Chapter 7 and Appendix B.	817	**DoP Submission No 120,181**

Issue Category	Comments	Response	Stakeholder ID	Name
Safety	The additional increase in container traffic will have the impact of increasing noise, increasing pollution and being an additional risk to children crossing the street. It will also be dangerous for elderly residents to cross Boronia Rd with the increased container traffic as there are only four sets of traffic lights located along the 2km stretch of road.	ILC operation traffic impacts have been modelled, further details are provided in Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety as the key consideration. Noise and air quality impacts are detailed in Chapters 11 and 12 of the Report.	726	**DoP Submission No 12,178,172**

Submissions General Community: SITE QUALITIES

Issue Category	Comments	Response	Stakeholder ID	Name
Site qualities	A magnificent site. All the infrastructure is in place. Railway lines are already connected to the site and interstate rail system All residential areas have a 4 tonne load limit	Noted	574	**DoP Submission No 6**
Site qualities	The site is not suitable for a facility of such a scale, given its proximity to residential areas and the adverse community and environmental impacts the redevelopment would create.	Further details of the surrounding land use are provided in Chapter 14. Further information on project need and justification are provided in Chapters 3 and 22.	713	**DoP Submission No 138,140,143,119**

Issue Category	Comments	Response	Stakeholder ID	Name
Socio Economic	Any use of the Enfield Marshalling Yards as a freight terminal should not be approved. The site is completely unsuitable for such facility given its proximity residential areas and the adverse community and environmental impacts the redevelopment would create. It would have disastrous impacts on our community, our environment and on our roads. I acknowledge the economic importance' of NSW of being able to cater for an expected increase in containerized trade over the coming decades. However, I am particularly concerned about the wider environmental and health impacts of vastly increasing the movement of freight in our region.	The suitability of the site is clearly demonstrated in the EA. A summary of the project justification is provided in Chapter 22. Impacts on air and noise from the operation of the site are acceptable within relevant guidelines and should have no implications for public health. These issues have been considered in Chapter 17. Removal of a significant volume of the freight traffic present on the road system and placing it onto the rail network will have beneficial air quality impacts on a larger scale.	794	**DoP Submission No 117**
Socio Economic	You mention community opportunities but do not specify what these may be. Work opportunities could be the only opportunities which are obvious but this would mean that buses would have to bring the workers who will not be using the shopping facilities at Chullora or at Strathfield.	Opportunities for community include: -employment (direct and indirect) including for Cosgrove Rd ancillary uses proposed in the Commercial/Industrial area. -community groups to utilise the community and ecological area in a controlled access regime. -assist in the decision and the future use of the Tarpaulin Shed	587	**DoP Submission no 5**
Socio Economic	It should be noted that this suburb is considered one of prestige within Sydney and the logistics centre would clearly lead to the demise of the reputation and value that this suburb has for many generations.	Noted. Further assessment of the impacts on health, well being and quality of life are provided in EA Report Chapter 17.	591	**DoP Submission No 14**
Socio Economic	The freight terminal will concentrate truck numbers and movements in our local community resulting in poorer health.	The operation of the ILC will comply with relevant air and noise guidelines and should therefore have no implications for public health. These issues have been considered in EA Report Chapter 17. Removal of a significant volume of the freight traffic present on the road system and placing it onto the rail network will have beneficial air quality impacts on a larger scale.	596	**DoP Submission No 19**
Socio Economic	While the construction and operation of the Enfield ILC may be able to employ some of the many unemployed in the nearby suburbs- a noble aspiration indeed- SPC chooses to ignore the negative aspects which would affect many other citizens in those nearby suburbs. SPC would argue that it costs more to shift goods further by rail, to then truck them back in an easterly direction. But if they are already on the rail how much more does it cost to go further by rail before unloading in the centre of the market catchment?	Consideration of the social and economic aspects of the proposal are considered in EA Report Chapter 17. The ILC is the most appropriate site for servicing the market catchment of the inner and middle western Sydney.	597	**DoP Submission No 21**

Issue Category	Comments	Response	Stakeholder ID	Name
Socio Economic	In addition to the volume of heavy vehicles using my street, the trucks will rumble down my street late at night and early morning, as I work long hours and require uninterrupted sleep, focus on my job is paramount and OH&S is paramount. Not to mention the health of my kids.	The operation of the ILC will comply with relevant air and noise guidelines and should therefore have no implications for public health. These issues have been considered in EA Report Chapter 17. Removal of a significant volume of the freight traffic present on the road system and placing it onto the rail network will have beneficial air quality impacts on a larger scale	598	**DoP Submission No 22**
Socio Economic	The reason that we are concerned about the noise impacts is because of the figures shown above and the fact that the report states that noise levels exceed the NSW Sleep Arousal Criteria.	The operation of the ILC will comply with relevant air and noise guidelines and should therefore have no implications for public health. These issues have been considered in EA Report Chapter 17. Removal of a significant volume of the freight traffic present on the road system and placing it onto the rail network will have beneficial air quality impacts on a larger scale.	599	**DoP Submission No 23**
Socio Economic	The massive number of truck movements in and out of the terminal, the manoeuvring of the trucks inside the terminal and the inevitable queues of trucks will pollute even more what is essentially a residential area that has a larger than usual number of schools in it.	ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety as the key consideration. Noise and air quality are further considered in Chapters 11 and 12 of the EA Report.	649	**DoP Submission No 65**
Socio Economic	There are five schools along the Hume Highway from Strathfield South to Bankstown, and then Yagoona, and several just off the Highway. I do no know how many in Greenacre and Chullora. A squashed child is not a pretty site and extremely traumatic to a truck driver.	Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety as the key consideration.	671	**DoP Submission No 76**
Socio Economic	Sydney Ports proposal would have severe impact on the health of residents as well traffic two within 10km radius of the site causing traffic jam, noise, air and lighting pollution for nearby residents. I am particularly concerned about the wider environmental and health impacts of vastly increasing the movement of freight in our region	. The operation of the ILC will comply with relevant air and noise guidelines and should therefore have no implications for public health. These issues have been considered in EA Report Chapter 17. Removal of a significant volume of the freight traffic present on the road system and placing it onto the rail network will have beneficial air quality impacts on a larger scale.	107	**DoP Submission No 68**
Socio Economic	Dramatic increases in the number of trucks along our roads and rail to and from the site as under the proposal will result in more traffic, more pollution and more noise, increased risk of road accidents and increased health risks. I acknowledge the economic importance to NSW of being able to cater for an expected increase in containerised trade over the coming decades. However, I am particularly concerned about the wider environmental and health impacts of vastly increasing the movement of freight in our region.	The operation of the ILC will comply with relevant air and noise guidelines and should therefore have no implications for public health. These issues have been considered in EA Report Chapter 17. Removal of a significant volume of the freight traffic present on the road system and placing it onto the rail network will have beneficial air quality impacts on a larger scale.	681	**DoP Submission No 94**
Socio Economic	These operations will result in increased health risks to residents in the areas surrounding the centre.	The operation of the ILC will comply with relevant air and noise guidelines and should therefore have no implications for public health. These issues have been considered in EA Report Chapter 17. Removal of a significant volume of the freight traffic present on the road system and placing it onto the rail network will have	686	**DoP Submission No 73**

Issue Category	Comments	Response	Stakeholder ID	Name
		beneficial air quality impacts on a larger scale.		
Socio Economic	It would have disastrous impacts on our community, our environment and our roads. I am particularly concerned about the wider environmental and health impacts of vastly increasing the movement of freight in our region.	The operation of the ILC will comply with relevant air and noise guidelines and should therefore have no implications for public health. These issues have been considered in EA Report Chapter 17. Removal of a significant volume of the freight traffic present on the road system and placing it onto the rail network will have beneficial air quality impacts on a larger scale.	713	**DoP Submission No 138,140,143,119**
Socio Economic	Enfield and its surrounding suburbs are working class suburbs with many residents being shift workers who deserve a restful sleep when required by their employment schedules. It has long been established by the medical profession who have researched populations in and around industrial areas that people who live in areas of noise air and light pollution suffer with: 1.stress due to lack of restful sleep and lack of respite from constant noise 2. respiratory problems due to pollutants in the air 3. Digestive problems. Due to the inability of the lungs to cope with polluted air people involuntarily begin to breathe through their mouths and the pollutants are not only therefore around the body via the lungs but also through the digestive system 4. skin problems from the toxins in the air.	Noted. The operation of the ILC will comply with relevant air and noise guidelines and should therefore have no implications for public health. These issues have been considered in EA Report Chapter 17. Removal of a significant volume of the freight traffic present on the road system and placing it onto the rail network will have beneficial air quality impacts on a larger scale.	736	**DoP Submission No 129,130**
Socio Economic	The FIAB report recommends adequate buffering to residential areas, Community Consultative Committees to ensure that local residents are "informed of terminal operations" and to provide "liaison with operators" and heavy penalties for container traffic through residential areas. Noise impacts for the Botany Rail Line is swept aside with the statement:	The appropriate approach to the management of effects from the rail freight line through is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will be happy to work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	30	**DoP Submission No 93**
Socio Economic	Politicians would not dare to take up a project of this size somewhere in wealthy Northern or Eastern suburbs. But who care as about Canterbury and surrounding councils-comparatively poor suburbs with low education levels and migrant population.	Further discussion of alternatives considered is provided in EA Report Chapter 3.	588	**DoP Submission No 7**
Socio Economic	It would have disastrous impacts on our community, our environment and our roads. Dramatic increases in the number of trucks going along our roads to and from the site as under the proposal will result in: • Increased traffic • Increased pollution • Increased noise • Increased risk of road accidents.	ILC operation traffic impacts have been modelled, further details are provided in Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety as the key consideration. Noise and air quality are further considered in Chapters 11 and 12 of the EA Report. Health issues and property impacts have been	45	**DoP Submission No 179**

Issue Category	Comments	Response	Stakeholder ID	Name
	• Loss of property values. However, I am particularly concerned about the wider environmental and health impacts of vastly increasing the movement of freight in our region.	considered in EA Report Chapter 17. The operation of the ILC will comply with relevant air and noise guidelines and should therefore have no implications for public health. Removal of a significant volume of the freight traffic present on the road system and placing it onto the rail network will have beneficial air quality impacts on a larger scale.		
Socio Economic	It is our understanding that there are no legislated restrictions on emissions from diesel train engines. This could have a significant health impact for Sydney residents through exposure to the deposition of particulate matter and toxins from these engines that are known be detrimental to the respiratory and cardiovascular health and longevity of residents, especially the very young and the elderly, or those with existing health conditions. If part of the Enfield site was sold for development, the resulting income could be added to the funds set aside to achieve the aims of the report. Again, noise, road congestion and emissions from the extra trucks will be a severe health issue in such a dense residential area. Public/private development. The report relies heavily on private sector participation. The Cross City Tunnel and the Airport/East Hills line projects have clearly demonstrated the difficulties likely to occur when government bends over backwards to encourage private business, at great cost to the community. ' 7. The cost of acquiring the proposed intermodal sites at Eastern Creek and Moorebank could be astronmomical. There is no estimate of such costs. The Federal Government is unlikely to 'give' the Moorebank site to the NSW Government. The Freight Infrastructure Charge is supposed to raise $375 million (the time span is not indicated) to pay for all the recommendations of this report (p35, para.2), using valuations determined by the Department of Commerce. This amount, at least, will be required just to up-grade the road and rail infrastructure in proximity to Port Botany. Will a charge apply to empty containers taken by road? 12% of containers exported from Sydney are empty '	The appropriate approach to the management of effects from the rail freight line though is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will be happy to work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor SPC has proposed the ILC as described in Chapter 4 of the EA.The proposed use of the site for various logistics operations is considered a 'value added' best practice model for the exchange of containers from the Port to local areas in an optimally efficient solution which provides large environmentally beneficial outcomes.	447	**DoP Submission No 315,158**
Socio Economic	I have two students in my household who are finding it extremely difficult to study and even more difficult to sleep. This makes it more difficult as we reside very close to an intersection and have to deal with the sound of brakes and skids.	Existing noise conditions are reviewed in Chapter 11 of the EA Report. There will be no perceptible increase in road noise levels due to the ILC generated traffic volumes. The Local Area Traffic Management Plan will ensure that trucks do not have access to residential streets in the surrounding area.	829	**DoP Submission No 245**

Issue Category	Comments	Response	Stakeholder ID	Name
Socio Economic	Anybody listening to the arguments on both sides will understand this proposal is a disaster for not just Strathfield residents but Bankstown, Canterbury and many other local areas will be forced out of their neighbourhoods. People will be forced to move away from the traffic snarls, rail noise and railway yard lights, lighting the sky throughout the night.	Traffic, noise and light spill are documented in Chapters 7, 11 and 16 of the EA Report.	828	**DoP Submission No 182**
Socio Economic	We are particularly concerned about inconvenience and delays for funeral and cemetery traffic that will result from the ILC Enfield.	The impacts of traffic movements on Rookwood Cemetery have been addressed elsewhere. They would be considered further during preparation of the Local Area Traffic Management Plan.	790	**DoP Submission No 137**
Socio Economic	There will certainly be disruption to existing businesses during construction phase and some means of mitigating that disruption and the consequent loss of business needs to be considered either by way of condition or by State Government compensation. Additionally there is concern about the future of local businesses once site operations commence especially along the northern end of Cosgrove Rd and in Norfolk Rd east, all of whom are heavily dependent upon on-street parking, should a future local area traffic management plan ban on street parking. Employment. Given the demographic profile of Strathfield residents, it is unlikely that a great many job opportunities will be opened up by the presence of an intermodal terminal for locals. Further, employment is more likely to be of a relocational nature than new jobs created. Suggestion of local economic benefit on the grounds of employment generation is specious. Residents perception of industrial usage/ rail v road. The statement that "most residents" however prefer more railway use regardless of how much they are affected by rail noise or road traffic "is strongly contested. (Stoltznow) and such a dubious response would be highly dependent on the question asked. Positive v negative impacts. There are no recognizable positive impacts from this proposal for local residents real or perceived. Economic benefits may be achieved on a broader regional scale, but these can never counterbalance the local disbenefits.	Further consideration of the potential for impacts on local businesses during the construction phase would be undertaken during preparation of the Construction Traffic Management Plans. Parking issues, access and safety would be considered during preparation of the Local Area Traffic Management Plan for operation. There is no proposal in the EA to change the current parking arrangements on any local streets. Further details of job creation opportunities are provided in section 4.11 of the EA Report. Noted. Noted.	817	**DoP Submission No 120,181**
Socio Economic	Many of our neighbours also agree that having the proposed Centre at Enfield will have a negative impact on our community.	Noted.	792	**DoP Submission No 116**

Issue Category	Comments	Response	Stakeholder ID	Name
Socio Economic	The increase of truck traffic on Liverpool Rd will discourage residents from using these shops or services. It should be noted that the service stations on Liverpool Road are some of the few service stations still in existence in Strathfield Municipality. Urban consolidation has resulted in the redevelopment of many service stations into medium density residential development. Urban consolidation which is primarily focused on increasing residential dwellings, can result in the reduction of commerce and industry, which provide services and employment to the local and regional community. Has any consideration been given to the impact of a substantial increase of heavy vehicle) traffic to these businesses(on Cosgrove Rd)? With increased traffic, there will inevitably be a demand for on street parking on Cosgrove Road to be abolished? The FIAB report [Recommendation 3] states 'participation from the private sector be sought ? for the [Enfield] site's development and the terminal's ongoing operation'. While this does not / state that the site may be sold to private interests, there is some concern about whether the site will continue to be government operated and managed. If future ownership and management of the site is not maintained in government control, assurances about future use may be irrelevant. Since Sydney Airport was privatised, use of the site is constantly intensifying with local councils and residents fighting against site intensification and proposed developments. It should be noted the original Port Enfield proposals in 2002-2003 involved capacity of 500,000 TEU per annum as opposed to the 300,000 TEU proposed in 2006. However, limits can be varied and is there any genuine guarantee that limits on rail transport movements will not be increased, particularly if site ownership is privatised or management transferred to private interests? The Environmental Assessment claims that the proposed ILC will create 840 direct and indirect jobs during construction and further 850 direct and indirect jobs during operation. It could be argued that other uses of this site eg development of commercial or business A centres would also create employment. It could be assumed that most jobs 'created' would involving shifting existing work from other sites eg Port Botany, otherwise the additional of labour in handling the transfer and management of goods at Enfield would add substantially to the overall cost of transportation. It should be noted that the development at	An increase in workforce in the area may also increase the use of local shops and services. These issues would be considered during preparation of the Local Area Traffic Management Plan. Noted. The impact on local businesses is considered in Chapter 17. Traffic and parking issues are to be further considered during detailed design. Private companies are expected to participate in the construction and future operation of leases within the site which will be retained in SPC ownership and management. The future of the light industrial /commercial area along the eastern edge of the site is unknown. The operation of the ILC has been designed to be constrained to 300,000 TEU throughput, through the intermodal logistics terminal (refer Chapter4 of the EA Report) Noted.	31	**DoP Submission No 136**

Issue Category	Comments	Response	Stakeholder ID	Name
	Rhodes Peninsula is creating at least 1500 office jobs, 850 retail jobs and 3000 dwellings on'} a site of 43 hectares. In comparison, the Enfield site is 60 hectares-''			
Socio Economic	We are aware that a number of businesses in the area have already moved or are planning to relocate to the newly opened M7 corridor to get better access to roads and trains in a less congested environment. They are leaving because the area around Enfield is heavily congested by traffic that limits the efficiency of their businesses.	Noted. Businesses relevant to the freight handling activities will remain near the area in which they do business. The catchment area for the ILC is inner and middle western Sydney.	447	**DoP Submission No 315,158**
Socio Economic	Much more than the $30 million for the current centre needs to be invested in getting a better utility of the land. It causes time and money loss for transport companies and other people/services utilizing other roads connected to the facility. The $165 million benefit (including multiplier effects) to the local economy is a one-off event over the period of the time of construction. In summary, more capital needs to be injected for infrastructure surrounding the proposed facility. This infrastructure will ensure (1) better utilize the land of the proposed facility (2) improve the economics to transport providers to and from the facility - (a)Less fuel used in idling, starting/stopping of trucks -hence savings (b) Less time idling for truck drivers and/or transport providers - saving time = saving money © Less particulants are generated by the idling starting/stopping of trucks — health effects and also economic effects of residents/workers in surrounding areas - better simulation studies need to be done on these points (1), (2) and (3). It is better to use semis and b-doubles rather than many trucks. As an alternative to increasing infrastructure, privatising and subdividing the land into light industrial factory units would generate more money one-off for the state and provide recurrent economic benefit to the local economy, the state and the country improving the balance of payments rather than encouraging of importing of goods that the proposed project will do.	Noted. Further discussions are to be undertaken with Council and the RTA during detailed design. Noted.	814	**DoP Submission No 135**
Socio Economic	Who will pay when residents get sick form gross overdevelopment.	Impacts in relation to health and wellbeing are discussed in EA Report Chapter 17.	798	**DoP Submission No 174**

Issue Category	Comments	Response	Stakeholder ID	Name
Socio Economic	it would be argued that the entire rationale for the Enfield proposal is to profit from an extremely valuable piece of real estate and to ensure it is on sold effectively DA approved, for highest and best use/return.	Project need and justification is provided in EA Report Chapters 3 and 22. The ILC will remain in the ownership of SPC and managed by it.	817	**DoP Submission No 120,181**

Submissions General Community: SUPPORT PROPOSAL

Issue Category	Comments	Response	Stakeholder ID	Name
Support Proposal	I believe the project should go ahead with all haste	Noted.	574	**DoP Submission No 6**

Submissions General Community: TARPAULIN FACTORY

Issue Category	Comments	Response	Stakeholder ID	Name
Tarpaulin Factory	It is not believed that the heritage items on the site are highly valued by the local community, in fact the dilapidated tarpaulin factory is regarded as an eyesore. Notwithstanding, there is some merit in relocating items of inherent interest and/or creating from them some outdoor museum depicting the railway history of the site.	SPC would consult further with the community about the future uses of the community and ecological area and the tarpaulin factory.	817	**DoP Submission No 120,181**
Tarpaulin Factory	The Tarpaulin Factory on Cosgrove Road is in a deteriorated condition [see photographs]. / This is not the original site of this building as the factory was relocated and reassembled to the site on Cosgrove Road. There are concerns regarding the deteriorated state of this item and the cost of its restoration and whether there are funds available for its maintenance.	SPC would consult further with the community about the future uses of the community and ecological area and the tarpaulin factory.	31	**DoP Submission No 136**
Tarpaulin Factory	Good to see a museum or indoor sport in the Tarpaulin Factory to retain history of this large important site.	SPC would consult further with the community about the future uses of the community and ecological area and the tarpaulin factory.	597	**DoP Submission No 21**

Issue Category	Comments	Response	Stakeholder ID	Name
Traffic	I don't know how anyone in our position would feel to have excess trucks passing our home 24 hours a day, 7 days a week causing further fumes, noise pollution and risk to our families. Dramatic increases in the number of trucks along our roads and rail to and from the site as under the proposal will result in more traffic, more pollution and more noise, increased risk of road accidents and increased health risks.	ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety the key consideration. Crash data was reviewed during preparation of the EA report. Further details are contained in EA Report Chapter 7 and Appendix B. Noise, air quality and potential impacts on health and wellbeing are considered in EA Report Chapters 11,12 and 17. Construction and Operation Environment Management Plans would be implemented to manage identified impacts.	681	**DoP Submission No 94**
Traffic	One has to consider the impact of such an enormous number of trucks on the roads around the logistics centre- in particular, Liverpool Rd, Centennial Drive, Homebush bay Drive, Roberts Rd and other related areas. Two matters are of concern here. Firstly there is the actual maintenance of roads with the increased heavy traffic. The costs of additional repairs over a considerable area of roadway must be considered. In addition, it must be remembered that roads such as Liverpool Rd take a huge amount of work day traffic to the south west of Sydney, as people travel to and from employment and schools. Roads such as Centennial Drive and Homebush Bay Drive take a similar amount of traffic from the south and north of the city and vice versa. Clogging these roads with this volume of additional traffic will cause major problems as employees seek to travel to work each day.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety the key consideration. Traffic generation from the ILC will result in less than 1% increase in overall traffic in the area. The contribution of this to road maintenance requirements would be small. Road congestion was assessed as part of the traffic modelling and the relative contribution to this from the ILC would be very minor.	626	**DoP Submission No 36**
Traffic	We already have to put up with the Boral Concrete plant, the Boral Asphalt plant and Finemores trucking company, all located on Roberts Rd. Do we really need '75% of truck movements would be via Robert Rd and Wentworth St intersection' or 'a weekday average of a total of 1160 vehicle movements per day on the roads' as quoted form the SPC newsletter dated 3/1/2006, if this proposal were to go ahead. I don't think so. Roberts Rd already is a major road leading south to King Georges Road and north to the Hume hwy. With the aforementioned industrial sites and normal traffic, this road is already chock a block with constant truck movements. It will be almost impossible with all the extra truck movements for residents to be able to gain access onto Roberts Rd.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic increases from the ILC operations on Roberts Rd will be minor and congestion on that road will not be affected by the proposal.	630	**DoP Submission No 39,98**

Issue Category	Comments	Response	Stakeholder ID	Name
Traffic	The building of the ILC is substantial and will result in a large increase in semi trailer truck movements in the Enfield area. Since the Enfield and surrounding areas are predominantly residential, this will result in a number of detrimental effects including, noise pollution air pollution and a risk to local pedestrians. Our local roads are already filled with traffic. The main roads in the area, the M5, Centenary Drive, and King Georges Rd are already congested and very little public transport infrastructure has been added to alleviate this problem. It doesn't make sense to add to this problem by building an Intermodal, which due to lack of road infrastructure will probably not be able to run efficiently.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration for pedestrian safety. Trucks would be prevented from accessing residential streets. Noise, air quality and potential impacts on health and wellbeing are considered in EA Report Chapters 11,12 and 17. Impacts on air and noise from the operation of the site are acceptable within relevant guidelines and should have no implications for public health. Construction and Operation Environment Management Plans would be implemented to manage potential impacts.	631	**DoP Submission No 42**
Traffic	Concerned about the traffic flow. We are already fully congested with pollution from heavy traffic.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration for pedestrian safety. Trucks would be prevented from accessing residential streets.	633	**DoP Submission No 46**
Traffic	Concerned about the traffic flow. We are already fully congested with pollution from heavy traffic.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration for pedestrian safety. Trucks would be prevented from accessing residential streets.	642	**DoP Submission No 62**
Traffic	Concerned about the traffic flow. We are already fully congested with pollution from heavy traffic.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration for pedestrian safety. Trucks would be prevented from accessing residential streets.	646	**DoP Submission No 62**
Traffic	The massive number of truck movements in and out of the terminal, the manoeuvring of the trucks inside the terminal and the inevitable queues of trucks will pollute even more what is essentially a residential area that has a larger than usual number of schools in it.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic	649	**DoP Submission No 65**

Issue Category	Comments	Response	Stakeholder ID	Name
		Management Plan which would be prepared with due consideration of the location of schools and pedestrian safety. Trucks would be prevented from accessing residential streets.		
Traffic	NoPE continues to oppose plans for an intermodal terminal at Enfield because we believe that the local and regional roads, some already acknowledged by the RTA to be at saturation, will not cope with the levels of road traffic proposed here, no matter how many millions of taxpayers dollars that might be thrown at "upgrades". We also believe that in order to maximise efficiency in the transport chain containers should stay on trains until they are much closer to their final destinations mostly the industrial west and south west of Sydney. Although the proponent claims that the proposed Enfield Intermodal Logistics Centre is now smaller (300,000 TEUs compared to 500,000 TEUs in the 2001 Port Enfield proposal), its impacts with regards to operational impacts and associated road and rail traffic would not be reduced, but in our opinion, would be greater because of the more extensive and intensive use of the site. This would result in greater truck numbers than the previous Port Enfield proposal which was rejected because "the scale and traffic impacts of Enfield alone make the current proposal unacceptable." (Independent Review Of Intermodal Terminal at Enfield The Hon Milton Morris AO February 2003 introductory Letter to Minister Scully). We believe that the only reason Enfield is being considered again is because the 2005 Planning Reform legislation gives a mechanism by which this development can rammed through with scant disregard for the impacts that this development will have on the local area, and indeed the region. We believe that the present proposal for the Enfield intermodal Logistics Centre at Enfield should be rejected for the same reasons as the previous proposals, that is the scale of this development and the traffic impacts are unacceptable in what is an essentially residential area, which cannot be isolated from or shielded from these impacts.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration for pedestrian safety. Trucks would be prevented from accessing residential streets. Alternative sites are considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line Details of the proposed site operations are provided in EA Report Chapter 4. The truck numbers are outlined here and in EA Report Chapter 7 – Traffic and are able to be accommodated by the surrounding road network. The proposal is to be considered under Part 3A of the EP&A Act. An independent panel has been appointed too assess the project. Noted.	30	**DoP Submission No 93**

Issue Category	Comments	Response	Stakeholder ID	Name
Traffic	As you know, traffic at Roberts Road and Hume Highway (Liverpool Road) are running at full capacity specially during business hours (06.00 hrs onwards) and there are no rooms for any additional traffic (trucks and semi trailers) to add on to these two roads. - We are really concerned that extra traffic generated by the Logistic centre will spill into the residential areas of surrounding suburbs - dramatic increases in the number of trucks (an extra 900 semi-trailers/day) going along our roads and rail to and around from the site as under the proposal will result in more traffic, more pollution, more noise.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. The increase in truck numbers on these roads due to the ILC is less than 1%. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration of local land use and pedestrian safety. Trucks would be prevented from accessing residential streets. Noise, air quality and potential impacts on health and wellbeing are considered in EA Report Chapters 11,12 and 17. Impacts on air and noise from the operation of the site are acceptable within relevant guidelines and should have no implications for public health. Construction and Operation Environment Management Plans would be implemented to manage any identified impacts.	107	**DoP Submission No 68**
Traffic	The increase in traffic along Roberts Rd since the completion of the M4 &M5 motorways has been 110% and the impact it has had on entering and leaving ones home to access the road has been enormous. I am informed through the project Newsletter that the volume of large trucks is expected to be approx 1160 vehicles per day. It is nothing for residents presently wishing to depart their homes by car to wait up to 2 hours during peak periods to be able to exit their driveways. The traffic flow now causes bedlam and mayhem- the future if this terminal is approved is a matter of grave concern. I and my neighbours have been blasted with car and truck horns when we indicate that we wish to drive into our driveway!! We want a solution to the present problems of traffic flow through Roberts Rd; not have the present problems exacerbated by the large trucks travelling the Road if the terminal is approved. I am very concerned with this proposal in particular the increase in traffic flow which will only add to the present problems and the increased noise levels associated with such a terminal being built in such a heavily populated housing environment	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic generation for m the ILC will result in less than 1% increase in overall traffic in the area. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration of local land use, access and pedestrian safety. Trucks would be prevented from accessing residential streets. Noise, air quality and potential impacts on health and wellbeing are considered in EA report Chapters 11,12 and 17. Impacts on air and noise from the operation of the site are acceptable within relevant guidelines and should have no implications for public health. Construction and Operation Environment Management Plans would be implemented to manage any identified impacts.	623	**DoP Submission No 32**
Traffic	Containers will be moved by rail from Port Botany to Enfield, transferred then trucked within the central inner west region. The Centre would be in operation for 24 hours, 7 days a week. The number of containers will increase from the current 18/day to 110-120 per day. This will result in more than 1,000 large truck movements per day and thousands smaller trucks and continuous rail movements	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Total truck movements into and out of the ILC will be about 1160 per day. Rail movements to and from the ILC will total no more than 20.	686	**DoP Submission No 73**

Issue Category	Comments	Response	Stakeholder ID	Name
	24 hours/day. These operations will result in considerably increased road and rail traffic At the least there should be a detailed independent traffic management study which assesses how all trucking traffic will get to and from Enfield and how impacts will be mitigated from a community perspective	The traffic study undertaken for the EA assessed truck movements and impacts. It concluded, amongst other things, that traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration of local land use, access and pedestrian safety. Trucks would be prevented from accessing residential streets. Further details would be provided during detailed design and traffic routes used by trucks managed through the Local Area Traffic Management Plan		
Traffic	We are already subject to a lot of traffic	Noted.	706	**DoP Submission No 77**
Traffic	We believe that if the construction of the terminal is to go ahead, it would cause and increase in traffic condition. Not to mention the change in traffic conditions once the freight arrives and is then being unloaded onto trucks and then transported to destination.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration of local land use, access and pedestrian safety. Trucks would be prevented from accessing residential streets.	711	**DoP Submission No 69**
Traffic	Dramatic increases in the number of trucks going along our roads and rail to and from the site as under the proposal will result in more traffic, more pollution more noise , increased risk of road accidents and increased health risks.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Rail traffic in EA Report Chapter 8. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration of local land use and pedestrian safety. Trucks would be prevented from accessing residential streets. Noise, air quality and potential impacts on health and wellbeing are considered in EA Report Chapters 11,12 and 17. Construction and Operation Environment Management Plans would be implemented to manage identified impacts.	713	**DoP Submission No 138,140,143,119**
Traffic	The significant increase in traffic numbers in excess of 1,000 truck movements would increase noise to the Greenacre area and affect resident's quality of life. The traffic flow report indicates that there would be a small	Noise, air quality and potential impacts on health and wellbeing are considered in EA Report Chapters 11,12 and 17. Construction and Operation Environment Management Plans would be implemented to manage identified impacts.	726	**DoP Submission No 12,178,172**

Issue Category	Comments	Response	Stakeholder ID	Name
	number of container trucks using Boronia Road Greenacre and there are no weight or time limits attached to the travel. This would indicate that any size container truck would be allowed to use Boronia Rd at any time of the day or night. The number of container trucks using Boronia Rd as advised in the Traffic Report is only an estimate and I believe the number is inaccurate. I believe the number would be higher as Boronia Rd, which becomes Juno Pde is a road that cuts the Hume Hwy and Roberts Rd and would be used by trucks as a possible short cut. The traffic flow information has not been properly analysed especially in relation to the increased impact to Boronia Rd residents and the potential increase in traffic numbers. Boronia Rd is not a suitable road for container traffic. Boronia Rd is considered a residential road as there are residential dwellings along the majority of Boronia Rd. The road surface of Boronia Rd would not be suitable to carry heavy vehicles and there have not been any noise reduction measures placed by the Council to reduce traffic volumes or any proposals by the State Government to reduce noise. I understand that Bankstown Council also objects to this proposal and agrees that Boronia Rd should also be treated as a residential road and would not be suitable as a State road fro trucks due to the high number of residents residing on Boronia Rd. A specific statement advising no access to Boronia Rd/Juno Pde Greenacre for container trucks from Roberts Rd or form the Hume Hwy. This will force container trucks to use the designated major arterial roads- Hume Hwy and Roberts Rd.	Traffic would be managed through the Local Area Traffic Management Plan. Further consideration of these issues would be undertaken during preparation of the Local Area Traffic Management Plan. Boronia Road / Juno Parade is a State Road, and is currently approved for use by B-Double trucks. There is no mechanism to prevent any trucks from using this route. However the EA, which takes into account the origin/destination of ILC traffic, indicates only 6 trucks per hour from the ILC (2-way) would use Juno Parade / Boronia Road during the morning and afternoon peak periods. The bulk of ILC trucks would use Roberts Road to access the M4 or M5 Motorways. A Local Area Traffic Management Plan would be implemented during operation to ensure trucks avoid local/ residential streets. We acknowledge that Juno Parade and Boronia Road are different in character to other State Roads such as Roberts Road and the Hume Highway. However, any changes to Juno Parade / Boronia Road's, State Road and approved B-Double route status is a matter between Council and the RTA.		
Traffic	Peg 6 of your newsletter states that there will be a lessening of traffic between Port Botany and the inner west. However this merely means an increase in traffic in and around Enfield and all its surrounding suburbs. You will not be achieving a lessening of traffic in the Sydney basin as such, you will merely be relocating the traffic problem from the Botany environs to the Enfield environs/ Relocating a problem is no substitute for curing a problem. We also note from p6 of the newsletter that only one third of new traffic generated by the intermodal will be light trucks. Therefore two thirds of the new traffic will be heavy duty trucks (e.g. semi trailers) which will exacerbate existing problems along Liverpool Rd and Centenary Drive.	The proposal would reduce the distance that freight is transported via road. The EA report quantified the reduction in truck traffic due to the freight by rail proposal. Increase in truck numbers on these streets will be less than 1% and will have little if any effect on the network performance.	736	**DoP Submission No 129,130**

Issue Category	Comments	Response	Stakeholder ID	Name
Traffic	I object to the proposal to build a port at Enfield because of traffic	Noted.	583	**DoP Submission No 1**
Traffic	Hume highway is already congested by trucks from the Sydney Markets, POST vehicles, traffic from Centennial Drive, Roberts Road and Cosgrove Road and Rookwood Cemetery. Accidents and delays on the Highway force traffic into residential streets.	The traffic volumes generated by the proposed ILC are low. There is no reason why they alone would cause traffic diversion into residential streets.	671	**DoP Submission No 76**
Traffic	Since the time (6-7) years ago that I came to live in Greenacre the traffic has increased 300%.	Noted.	594	**DoP Submission No 17**
Traffic	It is going to create a lot of traffic as the traffic is already bad in that area.	Noted. Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Noise, air quality and potential impacts on health and wellbeing are considered in EA Report Chapters 11,12 and 17. Impacts on air and noise from the operation of the site are acceptable within relevant guidelines and should have no implications for public health. Construction and Operation Environment Management Plans would be implemented to manage any identified impacts.	584	**DoP Submission No 2**
Traffic	Already there is too much traffic in and around the proposed area and leeching into the area as more and more people and industries are crammed into our suburb and surrounds/ No thank you we do not want that sort of traffic, what we have is already overbearing and not wanted.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Increase in truck numbers on these streets will be less than 1% and will have little if any effect on the network performance.	585	**DoP Submission No 3**
Traffic	A very concerned resident over the state of the future traffic outlets The project having been declared a major project has many necessary side effects to be considered. The outlet into the highway now from Cosgrove Rd where the traffic lights are installed entails all vehicles either turning right or left with the continued procession of traffic and the stopping of traffic lights proceeding ahead the excess vehicles would be never ending and many delays will occur with traffic caught on yellow lights no going ahead will proceed. One accident alone will cause such a blockage that the present system will not be able to cope. Traffic coming down Centennial Drive and all traffic on the highway will be continually blocked. The RTA will have to do some very serious scheme we	Noted. Noted. Our analysis indicates that the key point of congestion at this intersection is the eastbound movement which is restricted to 2 through lanes. No ILC traffic would add to this existing burden. Only about 25% of ILC trucks would use the Cosgrove Road intersection. Having 2 access points to the ILC allows flexibility to cope with incidents such as congestion. Trucks are also able to time their movements to avoid travelling in peak hours. Further consultation with relevant RTA is occurring.	586	**DoP Submission No 4**

Issue Category	Comments	Response	Stakeholder ID	Name
	have the transport coming from interstate. Leave the computer out of working out the problems. Send out the trained staff to spend a long period of time seeing for themselves the long period of blockage that will be continuous occurring. Very excessive planning is needed for the movement of traffic or the William St fiasco will be only a pup with all the commercial traffic in such a every day movement of traffic.	The operation of this intersection now and in the future has been discussed with RTA staff responsible for the operation of traffic signals. Further consideration of these issues would be undertaken during preparation of the Local Area Traffic Management Plan.		
Traffic	My family has lived at our address since 1961 and we have watched our quiet street grow into a rather noisy area over the years from increasing traffic which uses Hedges Ave and adjoining streets to by pass Centenary Drive when it becomes choked with traffic. In view of the extra traffic from the proposal. Will you be able to stop extra traffic from continuing onto Hedges Ave etc as I believe the extra trucks will find it more difficult to converge onto Centenary Drive. Future development will bring extra traffic. Trucks leaving Cosgrove Rd will move along the Hume Hwy to Centenary Drive which is already showing signs of congestion during morning and evening peak. Hour.. When an accident occurs, which frequently causes traffic jams, traffic uses Hedges Ave as a detour and we have seen large trucks negotiating the roundabout and bridge at Cave Rd/hedges Ave.	Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan. Trucks would be prevented from accessing residential streets. The traffic volumes generated by the proposed ILC are low. There is no reason why they alone would cause traffic diversion into residential streets. Noted. See comment above in ID 586.	587	**DoP Submission No 5**
Traffic	Concern about increase in traffic. Does not believe that someone would think of locating a port with such a high volume of traffic activity right in the middle of a suburban area.	Noted. The area is zoned for railway purposes and surrounding land uses are industrial.	588	**DoP Submission No 7**
Traffic	Project will disrupt traffic	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration of local land use, access and pedestrian safety. Trucks would be prevented from accessing residential streets.	589	**DoP Submission No 9**
Traffic	I am objecting to the proposal because of traffic movements	Noted.	590	**DoP Submission No 11**
Traffic	Effective truck surveillance is important and should include more than just video cameras as the truck drivers using Norfolk Rd exit/entry right now use the road as if it is a drag	Management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due	539	**DoP Submission No 35**

Issue Category	Comments	Response	Stakeholder ID	Name
	strip. Not to mention compression braking, they simply ignore the nice signposts that are erected. An alternative exit/entry to the ILC should be considered, the proposed Norfolk Rd exit at Roberts Rd is a poor choice for many reasons. Cost should not be used as an excuse for an alternative. One final point that last newsletter that went out to residents has a serious error. It reports of an intersection of Wentworth St and Roberts Rd, this is a mistake the intersection does not exist.	consideration of local land use, access and pedestrian safety. Trucks would be prevented from accessing residential streets. The use of surveillance measures would be reviewed during preparation. Alternatives were considered during preparation of the road traffic assessment in EA Report Chapter 7 and Appendix B. Noted. Wentworth Street turns into Norfolk Road and therefore have been assumed as the same road.		
Traffic	A lot more heavy vehicles will come into the area which already has a heavy traffic load	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic generation from the ILC will result in less than 1% increase in overall traffic in the area. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan.	592	**DoP Submission No 15**
Traffic	Traffic congestion in the local area with the great increase in trucks. Roberts Rd is increasing in volume every week without getting extra from a freight Terminal	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic generation from the ILC will result in less than 1% increase in overall traffic in the area. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan.	625	**DoP Submission No 33**
Traffic	There is too much traffic in our area as is.	Noted.	595	**DoP Submission No 18**
Traffic	We live in an area that already bares the brunt of heavy North/South and East/west traffic. We already have too many trucks in OUR streets. The increase in traffic is unacceptable. The freight terminal will concentrate truck numbers and movements in our local community resulting in more congested streets.	Noted. Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic generation from the ILC will result in less than 1% increase in overall traffic in the area. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan.	596	**DoP Submission No 19**
Traffic	Enfield is at the eastern perimeter (of the catchment sic) which means that hundreds of smaller trucks vans utilities or station wagons must block the roads around Strathfield and nearby suburbs east, until they reach their destinations further west. Ever since the Chullora Transfer station was commissioned, huge container trailers and trucks have	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan. This is a local traffic issue related to the Transfer	597	**DoP Submission No 21**

Issue Category	Comments	Response	Stakeholder ID	Name
	been using Amy St, Regents Park, the shopping centre of the suburb to negotiate between Rookwood Rd, over the train line at the Regents Park railway station, to access Park Rd leading west to Sefton or north to Auburn and beyond. Traffic banks up to a standstill each way at am and pm peaks.	Station. Traffic volumes in this area attributable to the ILC will be small.		
Traffic	As I live on Greenacre's thoroughfare, I have observed that each day the already congested is becoming heavily choked 24/7. The completion of the Terminal will no doubt increase traffic volume, particularly heavy traffic volume up and down our streets. Roads will deteriorate	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic generation from the ILC will result in less than 1% increase in overall traffic in the area. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan.	598	**DoP Submission No 22**
Traffic	I also believe that this proposal will increase the number of trucks will pass my home.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan. Through this trucks would be prevented from accessing residential streets.	618	**DoP Submission No 26**
Traffic	Concerned about the traffic flow. We are already fully congested with pollution from heavy traffic.	Noted.	620	**DoP Submission No 27,306**
Traffic	Roberts Rd is an "EXPRESS" not a road for more trucks that fly past the homes creating noise dirt and dust.	Noted.	622	**DoP Submission No 31,100**
Traffic	The building of the ILC is substantial and will result in a large increase in semi-trailer truck movement in the Enfield area. Since the Enfield and surrounding areas are predominantly residential this will result in a number of detrimental effects. Our local roads are already filled with traffic. The main roads in this area, the M5, Centenary Drive and King Georges Rd are already congested and very little public transport infrastructure has been added to alleviate this problem. It doesn't make sense to add to this problem by building an Intermodal, which due to lack of road infrastructure will probably not be able to run efficiently Since local roads are already congested, there is a concern that car drivers will increasingly use residential roads to avoid the traffic.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic generation from the ILC will result in less than 1% increase in overall traffic in the area. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration of local land use, access and pedestrian safety. Trucks would be prevented from accessing residential streets. The traffic volumes generated by the proposed ILC are low. There is no reason why they alone would cause traffic diversion into residential streets.	786	**DoP Submission No 106**

Issue Category	Comments	Response	Stakeholder ID	Name
Traffic	Strathfield has always been a quiet a pleasant residential area and my children have grown up in this wonderful suburb, this logistics centre will create more traffic and congestion on our roads.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan. Through this trucks would be prevented from accessing residential streets.	591	**DoP Submission No 14**
Traffic	For those with any experience of the operation and orientation of the Enfield site and the surrounding road network up to 5km radius and the existing state of the rail line and rolling stock it is clear that infrastructure of all types is currently deficient. This is not just an RTA matter, the infrastructure upgrading needs are much wider and deeper. There appears to be little acknowledgement that roads leading to and from the site, not just in the immediate perimeter, but further afield will be under stress from additional truck movements generated by the proposed development. On the site perimeter the following are significant constraint: width of the intersection of Norfolk and Roberts Road the main proposed ingress/egress for B doubles is already inadequate as demonstrated by recent B doubles turning circle trials. Norfolk/Wentworth are the main access routes for small and medium sized businesses and access to these sites will become problematic if in competition with B Doubles from the Enfield site. Turning circles on the corner of the Hume Highway and Cosgrove Road for right turn in from Hume Highway heading east are extremely tight. Conflicts exist for heavy vehicles entering and leaving Gould Street via Hume Highway.	Noted. Upgrade of road infrastructure is a matter for the RTA and Councils. Rail issues will be discussed between relevant agencies such as RailCorp, ARTC and DEC. SPC will assist in considering ways of mitigating impacts associated with rail operations in the dedicated freight rail corridor. Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. The ability of B-doubles to negotiate key intersections has been tested subsequent to the submission of the EA documents and confirmed with the RTA. Modifications would be made to the Roberts Road / Norfolk Road intersection to better manage B-Double turning and safety for all intersection users.	817	**DoP Submission No 120,181**
	The EA acknowledges that several critical intersections in the road network are now saturated (Table 4-6 p57 FTWP) or will be by peak operation in 2016. (v2 Final Transport Working paper p8). These include, but are clearly not limited to: Roberts Rd/Juno Pde, King Georges Rd/Punchbowl Rd, Hume Hwy/Roberts Rd/Centenary Drive, Hume H\vyI Coronation Pde, Hume Hwy/Cosgrove Rd ant Centenary Drive/Arthur St.). There is no suggestion as to how this will be managed or its impact on the efficient operation of the terminal. The issue here is that if as suggested the roads are already at capacity and can only get worse. Why would you advocate locating a transport	The ILC can perform adequately in the road network. In the future it is the growth in background traffic affecting the performance of some intersections Most of the ILC trucks will access the site by Roberts/Norfolk which is able to accommodate the level of traffic in agreeance with the RTA assessment.		

Issue Category	Comments	Response	Stakeholder ID	Name
	terminal in the location that is dependent on efficient network operation to be economically viable? The degree to which the presence of the Intermodal terminal adds to the existing or emerging situation is problematic. Traffic generation figures from the site are contestable and reference is made to Strathfield Council's submission in this, regard. Even the Transport Working Paper admits that it is almost impossible to quantify the number of vehicles to be generated from the site as there are too many variables at work. (p9). Additionally, Local area knowledge suggests that Peak hour traffic generated by the EILC will impact on the journey to work and to local schools not just by heavy vehicles but from movement off employees vehicles. Proposed staffing for the site is 378. At a worst case scenario this may mean at least 700 movements in and out of the site per day Future traffic generating activity around the site is given scant regard. The EA acknowledges that the presence of the intermodal terminal will change land uses over time(Vl p!4-10) the best guess estimate would be that the predominant use will become warehousing and freight industry focused ie.. traffic generating. Such a possibility has not been factored into the modelling. Passing mention is only made that there is no knowledge of any current development applications in the area. The EA states that additional truck activity generated by the Terminal would be concentrated on key arterial roads, yet ignores that to get to them trucks must pass through or adjacent to residential areas eg...along Centenary Drive, Hume Hwy Roberts Rd. Further to this, The EA suggests that there is likely to be more truck movement along the Hume to and from Coronation Pde which is heavily residential. One simply cannot escape the fact that the proposed site is surrounded by residential areas and any movements to and from the site must travel through or close to residential areas. Further, access issues and priority given to vehicles entering and leaving the site as distinct from existing and future businesses located on streets on the periphery/boundary of the site is of concern. Regulation and enforcement of traffic routes/load restrictions/speed etc along major arterial roads. Continual monitoring and resourcing of maintenance on major arterial roads leading to/from the site Widening of Roberts Rd/Norfolk Rd intersection. Although deemed by EA not at capacity recent trials indicate turning circles are inadequate for B-Doubles and a restriction recommended to Council's traffic committee for right turn only into Norfolk from Roberts.	Most employees at the ILC would work shifts which would mean they are not travelling during the network peak times. Employee trips were factored into the traffic modelling, although most employee movement would occur outside of the wider network peaks. Future traffic generating developments in the area were incorporated in the traffic assessment and modelling through a general increase in background traffic growth. Specific inclusion was also made of a new light industrial area adjacent to the ILC along Cosgrove Road. Roberts Road, Hume Highway and Centenary Drive are key components of Sydney's arterial road network. The use of these roads by ILC traffic is entirely appropriate. Local Area Traffic Management Plans would ensure that residential streets are avoided and trucks remain on arterial roads. The EA indicates that there would be 1-2 ILC trucks that would use the Hume Highway east of Cosgrove Road. However, given the market catchment for the ILC (predominantly west of Enfield) the impact on the Hume Highway (East) would be minimal. SPC is committed to ensuring that ILC operations comply with all relevant regulations and legislation, to minimise the impacts on the local community. In discussion with the RTA, modifications to the Roberts Road / Norfolk Road have been nominated to cater for turning B-Doubles.		

Issue Category	Comments	Response	Stakeholder ID	Name
	Bus route review - re-routing of buses from/to Strathfield, Bankstown and Belmore Station through Cosgrove Rd. This would assist not only future employees but local residents. Strathfield Council has already made representations, thus far unsuccessfully, to improve the North South route of buses for residents south of Liverpool Rd. RTA to take responsibility for reconstruction and maintenance of Cosgrove Rd, Wentworth Rd north, Norfolk Rd and all streets off same. Cycle route- signalized pedestrian/cycle crossing on Cosgrove Rd at Begnell Field giving access to the Cooks River Cycleway. This would provide not only transport options for employees but benefits to the local community in providing linkages between currently isolated parts of the community to open space and facilities.	Public transport considerations could be further reviewed and consultation undertaken with public transport providers, council and Ministry of Transport. RTA and SPC have reached agreement on intersection improvements for Norfolk/Roberts Rd and traffic control measures for Cosgrove egress during peak hours to minimise impacts onto Hume Highway intersection SPC has no plans to create cycle paths		
Traffic	The expansion of Port Botany has been estimated to add approximately 2,000 more trucks per day to Sydney's roads. When considered along with plans to dramatically increase the 'footprint' of Sydney Airport, the impact will be immense. Noise pollution, air pollution and traffic congestion will increase and a whole of Sydney will be affected, including suburbs in the Bankstown Local Government Area where I live. The impact of the massive network of inter-modal freight transfer terminals in Botany, Enfield, Moorebank, Minto, Ingleburn and Eastern Creek, which will service the new port, will be felt all over Sydney. Suburban streets will become industrial thoroughfares. I urge the State Government to reconsider this infrastructure development proposal. I do not want an Inter-modal Logistics Centre in Enfield or the resulting damage to the environment and increase in pollution, traffic congestion and the consequent effect on the health of	The expansion of Port Botany and the future growth of Sydney Airport have been incorporated into the traffic model (as documented). Traffic volumes and their consequences will increase over time, regardless of the presence of the ILC. Noise, air quality and potential impacts on health and wellbeing from the ILC are considered in EA Report, Chapters 11,12 and 17. Impacts on air and noise from the operation of the site are acceptable within relevant guidelines and should have no implications for public health. Construction and Operation Environment Management Plans would be implemented to manage identified impacts. Trucks would be prevented from accessing residential streets through the Local Area Traffic Management Plan. The NSW metropolitan intermodal freight network strategy is confirmed in the FIAB Report. This will contribute to the NSW Government's goal of moving 40% of Port Botany containers by rail Noted.	811	**DoP Submission No 125**

Issue Category	Comments	Response	Stakeholder ID	Name
	residents			
Traffic	I have studied the Environmental Impact Statement (EIS) associated with the Intermodal Logistics Centre (ILC) at Enfield and believe the issue of noise and traffic have not been adequately addressed. 1160 truck movement between 6am and 5pm would indicate this development should not proceed without significant road network improvements. The reports does not cover new industry being drawn to the area through the opening of the ILC or the additional traffic on Roberts Rd /Centenary Dr upon the opening of the M4 East, which is at full capacity at peak times now. The reports only recommendation is to further investigate network improvements. Upgrade the Cosgrove and Liverpool Road intersection. Liverpool Road travelling east is continually reduced to a single carriageway due to insufficient space for trucks to turn into Cosgrove Road, Gould Street and Braidwood Street. Road network improvements along Roberts Rd Centenary Drive.	Noted. The noise and traffic impacts identified in the EA that are required to be mitigated, will be addressed in the preparation of Construction and Operation Environmental Management Plans. There would be 1160 truck movements across the 24-hour period, reducing the peak impacts of the ILC. New growth in the local area has been addressed through the inclusion of background traffic growth. Also, the assessment specifically includes a new light industrial development adjacent to the ILC on Cosgrove Road. There are no firm proposals for the M4 East corridor, so it has not been included. Widening of the Hume Highway to 3 lanes eastbound is one recommendation of the EA. This would be required in the future even without the ILC in operation. This has been discussed with the RTA.	569	**DoP Submission No 131**
Traffic	Just thinking about the truck traffic up and down. There is enough traffic now already but I would like to know if this to be a 24 hour seven day traffic problem, as well? You don't win these applications, other times we had similar traffic objections and they won then. The minister for planning will get his way.	Traffic generation by the ILC will result in less than 1% increase in overall traffic in the area. The Minister for Planning makes the determination on the proposed development.	812	**DoP Submission No 133**
Traffic	It is expected that the number of semi trailers and B doubles will increase up to 1000 per day. The existing arterial roads are already too noisy too busy and too narrow to manage an increase in large vehicles	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan.	813	**DoP Submission No 176**
Traffic	I don't believe that the logistics centre will generate an extra 2% (rounded) of traffic for the current infrastructure -1 believe that vehicles moving in and exiting the proposed facility based on current infrastructure will block other traffic not using the facility - particularly Centennial Dr, Roberts Road, Cosgrove Rd and Punchbowl Rd. More detailed modelling/simulation needs to be done. There was no study done for a full capacity of the logistics	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration for pedestrian safety. Trucks would be prevented from accessing residential streets. The traffic impacts of the facility for 300,000 TEU have	814	**DoP Submission No 135**

Issue Category	Comments	Response	Stakeholder ID	Name
	facility - more simulation studies need to be done on the effects of running the logistics centre on wider roads – particularly widening Cosgrove Rd and Punchbowl Rd. The overhead bridge from Roberts Rd and Norfolk Ave is insufficient if full utility of the land is proposed. Punchbowl Rd needs to be widened - there has been provision for this for over 40 years - check RTA plans. A road and bridge from Punchbowl Road to the Logistics would be needed to fully utilize the land and reduce the particulants. Also funding for the widening of Cosgrove Rd needs to be provided by the State rather than the ratepayers of Strathfield in order to allow a far more smooth traffic flow of b-doubles and trucks. The stopping, starting and idling of trucks causing causes more particulants to be produced and increases the waiting times to enter and exit the facility for the current infrastructure. How Cosgrove Rd will get widened to cope with the extra traffic will have to be decided by the engineers at State and Local Government levels - local businesses along this busy road will need access particularly at peak times. Cosgrove Rd is not wide enough as it is and more simulation studies need to be done for the full utility of the proposed logistics centre. The capital requirements needed to better utilize the land are - (1) widening Cosgrove Rd to handle extra traffic (2) widening Punchbowl Rd with a bridge/path running from Punchbowl Rd into Juno Pde into the proposed project. A simulation study needs to be done in order to validate the construction of this infrastructure.	been documented in Appendix B of the EA. There are no proposals for road widening and no need for widening to occur. These works will be required without the ILC being developed and should be discussed between the RTA and Councils. See above comment.		
Traffic	Sydney Ports claims, "there would be a reduction in growth of heavy vehicle traffic on the M5 Motorway, due to a reduction in truck activity from Port Botany to the inner and mid-west of Sydney." (January Project Newsletter, page 6, final dot point.). This is completely misleading. There will be an overall increase in road traffic from Port Botany on the M5, of such a magnitude that the M5 will need amplification. Other reports we have seen propose the widening of the King Georges Road/Roberts Road/Centennial Drive corridor, to accommodate the forecast increase in containers being transported by road because these arterial routes are already congested to saturation point for most of the day (SMH December 2004). • There will be an overall increase in freight truck movements on these road networks of at least three times more than current numbers, because there will be a three-fold increase in throughput at both Port Botany and	There will be a reduction in the growth of heavy vehicles, not an overall reduction. An Intermodal logistics centres would result in a reduction in truck movements to/from Port Botany and Enfield, replaced by containers being carried by train. There are no known proposals within the State Government to widen this corridor. The increase in throughput at Port Botany would only be possible if the mode share to rail is increased. The Enfield ILC is a key factor in reaching this target. Overall truck numbers on the roads will increase due to increased carriage of goods. This increase will be relatively reduced by transferring goods to rail systems for transport.	447	**DoP Submission No 315,158**

Issue Category	Comments	Response	Stakeholder ID	Name
	Enfield Sydney Port's false claim of a reduction in truck movements puts paid to its further claims that the development will also reduce noise impacts, pollution and greenhouse gas emissions. An increase in truck movements and in train movements means an increase in environmental impacts over what currently exists. The trucks entering and leaving the Enfield facility will not only make a significant impact in the immediate vicinity of the operation, but also across Bankstown and South Western Sydney. As these trucks travel to and from the Enfield terminal they will add further to existing congestion on the Hume Highway, Roberts Road - Centennial Drive and other arterial routes. Trucks accessing Enfield will comprise B-doubles carrying full and empty containers, as well as smaller trucks bringing in goods to be packed into containers and delivering unpacked goods. This will also entail many trips by empty trucks because of the difficulty of co-ordinating trips. This will ensure a huge increase in truck activity in the locality that is not acceptable. Add to this the mainly night time traffic volumes from News Ltd, Fairfax, Australia Post Parcels, Weston's Bakery and the Chullora intermodal terminal, etc. With the proposed levy on trucks carrying containers during daylight hours, such vehicles are very likely to operate at night to avoid the levy, adding to the road congestion in the area. It is not indicated how heavy vehicles will be prevented from accessing Cosgrove Road via Punchbowl Road. This can only be achieved by closing, or partially closing, Cosgrove Road at the Southern end. There is nothing to stop heavy vehicles, especially the non-container trucks from crossing Roberts Road at Greenacre and proceeding along Norfolk Road, an entirely residential precinct, nor any means of policing these vehicles to enforce adherence to designated routes. • It may be possible to restrict container trucks to arterial routes, but it will be much more difficult to restrict smaller trucks, that carry the unpacked goods to and from the containers. Because of main road congestion they will use local residential streets.	Trucks currently move between Port Botany and western Sydney. With the ILC in operation they would travel only between Enfield and western Sydney. This reduction in distance would result in a decrease in vehicle emissions and fuel consumption. A series of mitigation measure are proposed to be developed further during detailed design, and through Construction and Operation Environmental Management Plans. The ILC would increase the proportion of trucks on the Hume Highway and Roberts Road by less than 1%. The on-site warehousing will allow storage of containers and goods, so that co-ordination of trucks is not an issue. A vehicle booking system would be in place to limit the number of trucks at the ILC at any one time, and to minimise empty running. The ILC is expected to operate with a backloading rate of 30% by 2016. There is less congestion at night on the road network. Details relating to how traffic is to be prevented from entering specific roads and residential streets would be determined during development of the Local Area Traffic Management Plan. The smaller trucks from and to the warehousing on the site will be of the order of 8-10 tonnes, and will be subject to Local Area Traffic Management (LATM) controls in residential streets. We anticipate that most of the smaller trucks would access the ILC via Cosgrove Road where the warehouses are located adjacent to this access point.		
Traffic	Our highest concern is in regard to the proposed development is the increase of traffic, particularly heavy vehicles on roads surrounding the Enfield ILC. We are concerned that increased amounts of heavy vehicles will	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA report Chapter 7. The increase in overall traffic volume on streets in the	31	**DoP Submission No 136**

Issue Category	Comments	Response	Stakeholder ID	Name
	be using the same roads as motorists and increasing congestion, pollution and compromising motorist safety.	vicinity of the ILC will be less than 1% and will not cause a significant increase in congestion. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration for safety. Trucks would be prevented from accessing residential streets.		
	In addition, we fear that light traffic will increase throughout Strathfield Municipality by motorists trying to avoid arterial roads such as Centenary Drive, Roberts Road and Liverpool Road. There has been a noticeable increase in traffic in Strathfield in the last ten years, particularly due to major residential developments in areas such as Homebush, Homebush West, Liberty Grove, Rhodes and so on.	The traffic volumes generated by the proposed ILC are low. There is no reason why they alone would cause traffic diversion into residential streets.		
	Centenary Drive including the overpass across Liverpool Road took many decades to be completed. This opening of this road had the effect of moving some through traffic from Strathfield's residential streets and expediting traffic movement between key arterial roads and motorways. With the increased use of Centenary Drive with heavy truck vehicles, increased amounts of light traffic will use Strathfield Municipality's residential streets in preference to avoid heavy traffic and delays caused by increased use. If this development proceeds, the State Government should investigate intersections by building of overpasses or underpasses at intersections such as CentenaryDrive/Arthur Street, Centenary Drive, which is part of the roadways of Homebush Bay Drive and Roberts Road/King George Road, connects much of the traffic from the north shore to the west and south west.	The assessment in the EA Report Chapter 7, shows these works will be required without the ILC being developed and should be discussed between the RTA and Councils.		
	The development of the Rhodes Peninsula, Sydney Olympic Park, Liberty Grove and proposed development in the Parramatta Road corridor rely on these roads to facilitate traffic movement, particularly small vehicle." Many of the areas targeted under State Government Urban Consolidation programs rely on these roads for transport. Access to facilities including local business. The proposed Intermodal terminal at Enfield will involve road access points into the site at Cosgrove Road and Roberts Road. Despite the claims by Sydney Ports that there will be no access from the southern point of Cosgrove Road, trucks will still enter into Cosgrove Road from Liverpool Road at the north end. The proposed entry on Cosgrove Road involves turning from Liverpool Road. Access to Cosgrove Road by heavy truck vehicles will have a detrimental impact on both residential and commercial properties in Strathfield and Strathfield South.	Truck volumes will increase by less than 1% as a result of the ILC. Most if not all of these will travel to/from the west and mostly via Roberts/Norfolk Roads. No trucks will access the ILC via Cosgrove Rd south.		

Issue Category	Comments	Response	Stakeholder ID	Name
	If entry to the site from Cosgrove Road is open, trucks will enter Cosgrove Road from Liverpool Road. It is likely many trucks entering the Cosgrove Rd entry will travel along Liverpool Rd from an eastern direction, rather than from the Centenary Drive/Liverpool Road / intersection, because trucks on Centenary Drive would logically enter from Roberts Road [eg Roberts Road is the continuance of Centenary Drive]. If trucks travel along Liverpool Road from an eastern direction, this will have a serious impact on residential areas. The Environmental Assessment claims that the proposed ILC would significantly increase the number of containers delivered by rail close to where the importers and exporters are, thereby reducing the number of truck kilometres travelled. Certainly, this would occur if the final point of delivery was located in close proximity to the Enfield intermodal terminal. However, in the diagram 'Key businesses within the Enfield ILC market catchment area' many businesses are located over 20 kilometres from Enfield, which will require road travel for the distance between Enfield and their final destination. These include sites at Huntingwood [25 kms from Enfield], Prestons [28km from Enfield], Wetherill Park [24km from Enfield], Seven Hills [26 kms from Enfield]. It should be noted that most of the Enfield 'catchment area' is the outer Western Suburbs. Transportation from the Enfield site would still require the majority of trips from Port Botany to be via road, not rail.	There would be few, if any, trucks accessing the ILC from east of Enfield, due to the target market that the ILC serves, to the west of Enfield. Trucks using the Cosgrove Road access may come from the Hume Highway west of Roberts Road. There would be a decrease in the kilometres travelled by heavy vehicles in order to serve this market, compared to if movement to/from Port Botany was by road only. Most of the Enfield catchment area is within 15 km of Enfield. Some activities will be internalised on site (containers to/from warehouses) which otherwise would have been made on the external road system from Port Botany.		
Traffic	I note in your layout of key features you show only a small arrow to the main exit and don't indicate the exit roads and very little of Roberts Road and nothing of the residential area on the other side of Roberts Rd who are the main people affected by the increase in traffic. As you state in your report all traffic would concentrate on Roberts Rd and Centennial drive.	Noted. Traffic movement during operation would be managed through the Local Area Traffic Management Plan. This would take into consideration potential impacts on residential areas.	571	**DoP Submission No 13,154,170**
Traffic	Traffic suggestion There should be a dedicated link road directly onto Roberts Rd incorporated into the development. It should be an overpass road that directly feeds north and south onto Roberts Rd with enough curb side run in lane way that allows for the smooth integration of traffic both onto and off Roberts Rd. The western end of the site could easily provide for this direct link road. As the NSW Government also control the road through the RTA… I cannot foresee any issues there. It should simply be two arms of the NSW Government sorting it all out. This would absorb most of the traffic generated by the proposed development and would also remove the increased traffic off the local roads- which are already at capacity. That is not to say that there should not be street	Numerous access options were considered prior to documentation and submission of the EA. The two access points of Cosgrove Road / Hume Highway and Norfolk Road / Roberts Road were the most beneficial.	823	**DoP Submission No 99**

Issue Category	Comments	Response	Stakeholder ID	Name
	access both in and out off the local roads, but with the flyover pass road feeding onto the main road- that would be the main truck access… in and out of the site.			
Traffic	You can't even imagine how much noise, dust, vibration, pollution will be experienced by us. Even before the actual functioning starts, there will be so much construction traffic that our life would be made hell. You can't hide behind the fact that... Oh, Hume Highway is already very busy and road traffic is predicted to rise in the near future, so what the heck we might as well put some more trucks on the road, wouldn't make much difference	Noise, air quality and potential impacts on health and wellbeing are considered in EA report Chapters 11,12 and 17. The impacts can be managed and consistent with Government guidelines. Construction Environment Management Plans would be implemented to manage identified impacts. Traffic issues are addressed in EA report Chapter 7. The increase of traffic on Hume Highway will be very low in the context of traffic already on the road and that will be on the road in the future.	542	**DoP Submission No 122**
Traffic	People will be forced to move away from the traffic snarls.	Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled, further details are provided in EA report Chapter 7. The increase in overall traffic volume on streets in the vicinity of the ILC will be less than 1% and will not cause a significant increase in congestion. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration for safety. Trucks would be prevented from accessing residential streets.	828	**DoP Submission No 182**
Traffic	The road we reside on, Roberts Rd, is already an extremely busy road. At all times of the day and night during the week and on weekends the road is congested with traffic. The traffic has resulted in many negative impacts on the residents of Roberts Rd and a Sydney Port for a freight terminal will only increase these negative impacts on residents. To build a freight terminal in Enfield will lead to increased traffic and worse conditions for residents	Noted. Traffic issues are addressed in EA report Chapter 7. The increase of traffic on Roberts Rd will be low in the context of traffic already on the road and in the future. Existing traffic issues have been reviewed and ILC operation traffic impacts have been modelled. The increase in overall traffic volume on streets in the vicinity of the ILC will be less than 1% and will not cause a significant increase in congestion. Traffic management measures during operation would be implemented through the Local Area Traffic Management Plan which would be prepared with due consideration for safety. Trucks would be prevented from accessing residential streets.	829	**DoP Submission No 245**
Traffic	The report states "This involves, in effect, containers being transported longer distances by rail followed by shorter haul by road to their end destination." (page 15, par. 1) This cannot be achieved if 300,000 containers per year are off-loaded at Enfield and the containers, or their contents, transported all over Sydney. 300,000 containers means	Off loaded containers will be transported into the immediate catchment of inner and middle western Sydney. The use of rail for 18km will reduce the distance that each container has to move by road. 300,000 TEU equates to less than 200,000 containers per year, and could be carried by less than 150,000	447	**DoP Submission No 315,158**

Issue Category	Comments	Response	Stakeholder ID	Name
	300,000 large trucks moving onto local roads, if they are not unpacked. However, if the containers are unpacked on site, we could have 900,000 smaller trucks jamming up the roads around Enfield, Strathfield and Bankstown. With local major roads already at capacity for most of the day, especially the Centenary Drive/Roberts Road/King Georges Road corridor, the M5 and the Hume Highway, there would be an extremely negative impact on the residents and motorists of the area. Again, noise, road congestion and emissions from the extra trucks will be a severe health issue in such a dense residential area. Although the report claims that a 'zero tolerance' policy will help ensure that containers transported by road will use only designated routes, there is no way of keeping these smaller trucks off local residential streets. Since most containers delivered by road within the metro area are delivered in business hours, rebates will only be available for containers travelling to regional or interstate destinations, unless the trucks travel to their metro destinations and then park and clutter local streets until they make their delivery. Designated night-time off-peak hours are not indicated.	trucks. There would be 1160 truck movements per weekday. Truck numbers were identified in Chapters 4 and 7 of the EA report. There would only be 334 smaller truck movements per weekday. These numbers will make a minimal impact on existing and future background traffic on the road network. Noise, air quality and potential impacts on health and wellbeing are considered in EA report Chapters 11,12 and 17. Construction and Operation Environment Management Plans would be implemented to manage identified impacts. SPC is committed to monitoring the compliance of ILC trucks with relevant regulations and legislation. Truck movements would be controlled through a Local Area Traffic Management Plan, which will prevent trucks from accessing residential streets, particularly Norfolk Rd (west) opposite the main access point for the ILC site. A rebate scheme for carrying containers by road out of normal hours is not in operation. . The ILC will operate 24 hours a day 7 days a week. It is not in the financial interest of the truck operator to wait in streets to make their delivery. Most truck movements will be in daylight hours. Those at night will be to locations that are able to receive them.		
Traffic	Gould Street / Hume Highway Intersection. (This important intersection does not rate a mention - it is the access to another container storage area and industrial sites - and is approximately 70 metres west of, and parallel to Cosgrove Road. Comments. To claim in the EA that the increased traffic flow from the Enfield ILC will have little or no effect up until 2016 on traffic flows on the above mentioned problem intersections makes a mockery of local knowledge. One would wonder who designed the traffic flow models, collated the biased data, and the authenticity of the facts used in the assessment. In the Road Network Link Capacity Assessment (Vol.2 Page 52—4.3) Ports seem to have stuck their heads in the sand. The 2005 study indicated that Roads such as the Hume Highway are at or approaching their theoretical capacity, represented by a degree of saturation of > 0.9 or greater. How can they then claim that the additional Ports	No change is anticipated at the Hume Highway / Gould Street intersection, other than a general increase in traffic associated with background growth, independent of the ILC. Details of the traffic modelling are provided in EA Report Chapter 7. The data on which the modelling is based was collected by independent survey firms. The modelling used industry standard practice methodology. There are currently some 60,000 vehicles which use Roberts Road each day. The ILC would increase this by less than 1%. The volumes generated by the ILC and likely to travel on Hume Highway are minimal and will have a small impact on the road network performance.	834	**DoP Submission No 319**

Issue Category	Comments	Response	Stakeholder ID	Name
	generated traffic flow (B-Doubles, articulated trucks, smaller trucks and the private vehicles of employees) will make only a negligible difference to intersection congestion?			
	During the major staff shift rotation 3.30p.m. to 4.30p.m. (Vol 2 Page 41 3.3.7 Summary of Operational Staff.) ILC indicate a truck movement of approximately 90 trucks (Vol 1 Fig 7-4). They fail to include the 236 employees who come and go from the site at this time. As there is no public transport to the site it seems likely that 236 private vehicles will be added to the forecast number of truck movements during that period. This equates to a possible 326 vehicle movements to and from the site during this critical one hour period.	The movement of staff has been incorporated in the assessment.		
	The greatest potential for gridlock will occur when the ILC traffic coincides with school starting and finishing times (8.00 - 9.30 and 2.30 - 4.30) when parents drop off and pick up their children from Strathfield South High School and Malek Fahd Islamic School (just off the Hume Highway in Waterloo Road, Greenacre.) The greatest concentration of vehicles at the Islamic school occurs from about 3.30 pm to approximately 4.15 pm and almost invariably the traffic ceases in the left hand lane of the Hume Highway.	The movement of trucks to/from the ILC would be dispersed so that the trucks are not concentrated on one particular location. The 2 access points to the ILC gives truck drivers flexibility to avoid congestion if necessary.		
	The EA also fails to recognise the importance of the Norfolk Road intersection as an access point to the Chullora Market Place and the parents dropping off and picking up children from the Malek Fahd Islamic school .It also provides important access for the residents of the high density housing development known as Norfolk Village. The intersection at Cosgrove Road and the Hume Highway is stated as poor even without the operation of the proposed ILC Development. This intersection is important to the successful operation of the ILC (Chapter 7 7.4.4 Volume 1—Intersection Performance.)	The EA predicts satisfactory operation of the Norfolk RD intersection at peak times even with the ILC in operation. In consultation with the RTA, the intersection would be upgraded to improve safety for all road users. The Hume Highway / Cosgrove Road intersection would provide a secondary access point to the ILC, necessary for safety and operational reasons. The main cause of congestion at this intersection is the absence of a 3rd eastbound lane on the Hume Highway. The small proportion of ILC traffic that would use this intersection would not exacerbate this situation.		
	The proposal by the EA for ILC to have permanent use of all four lanes at the northern end of Cosgrove Road could lead to a monopoly on the entire paved road surface, thus preventing roadside parking which is essential to the already established businesses along this section of road. Currently this section at the northern end of Cosgrove Road is in fairly poor condition.	The EA does not propose the removal of parking from this intersection to serve ILC interests.		
	If ILC hold over any of their stated 1160 truck movements per day,then to prevent queueing,these trucks according to ILC would be held on site. Subsequent hourly	There would be no reason for the ILC to hold over any truck movements. Trucks if necessary will queue on site to wait until serviced as normal.		

Issue Category	Comments	Response	Stakeholder ID	Name
	clearing rates could then well exceed the estimated peak flow of 100+trucks/hour.In addition ILC could not prevent privately owned trucks from leaving the site. To do so could prevent the removal off-site of the contents of approximately 140 TEU's per day. These trucks will then take any route they can to exit the site. If the Hume Highway and Roberts Road have reached saturation then the only way out is via the southern end of Cosgrove Road to the Punchbowl Road Intersection. Rat Running Here We Come EA (Table 7-6 page 7-19 Vol 1,Future Intersection Operation.) shows 2 intersections with 2005 Level F -AM Peak rating and 1 intersection with Level E-AM Peak rating. Projections for 2016 show 5 intersections with Level F-AM Peak rating, and 4 intersections with Level F-PM Peak rating. These 2005 ratings are considered by those with local traffic knowledge to be gross underestimates of the current situation, so it follows that the projected figures for 2016 could well be wide of the mark.	The two access points are able to accommodate the expected traffic volumes generated by the ILC The Cosgrove Road site access would be configured to prevent the movement of trucks between the ILC and the southern end of Cosgrove Road. Use of residential streets by heavy vehicles would be prevented through implementation of the Local Area Traffic Management Plan. Level of Service is a measure of the weighted average delay experienced by all vehicles using an intersection during a 1-hour period. So it may be that despite delays on one or more legs of an intersection, an acceptable level of service is demonstrated. The 2005 Levels of Service were based on surveys of volumes at each intersection during the morning and afternoon peak periods.		
Traffic	It would have disastrous impacts on our community, our environment and our roads. Dramatic increases in the number of trucks going along our roads to and from the site as under the proposal will result in: Increased traffic	Impacts on community are discussed in Chapter 17. ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Trucks would be prohibited from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety one of the key consideration.	45	**DoP Submission No 179**
Traffic	I have lived in Roberts Rd for 54 years. I feel sorry for the people in cars trying to get home most nights as the cars and trucks on Roberts Rd are bumper to bumper. I don't drive and I have to cross Roberts Rd to go to my Dr in Waterloo Rd and also I shop at Greenacre. I find it hard to cross Roberts Rd. I can't see how it will minimise the traffic on Roberts Rd as it is bad enough now. My next door neighbour has trouble getting her car out on Roberts Rd	ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. The increase of traffic on Roberts Rd will be very low in the context of traffic already on the road and that will be on the road in the future.	797	**DoP Submission No 171**
Traffic	The residents of Belfield have to contend not only with increased vehicular traffic but also rail traffic. Although the proposal anticipates 'at least 75 per cent of truck movements would be via Roberts Road and Wentworth Street', I have noticed an increase in the number of heavy vehicles using Burwood Road, Belfield, turning into and from Punchbowl Road. With increased fuel costs, many truck drivers are tempted to take shortcuts.	Noted ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Traffic would be managed through the Local Area Traffic Management Plan which would also prohibit trucks from using residential streets and would be prepared with due consideration of access issues.	524	**DoP Submission No 110**

Issue Category	Comments	Response	Stakeholder ID	Name
	Our suburban streets are already congested and any increase in cars or trucks would have a detrimental effect on the health and wellbeing of the local residents.	Noise, air quality and potential impacts on health and wellbeing are considered in EA Report Chapters 11,12 and 17.		
Traffic	And they are very many people who will be grossly affected by the proposal's increase in freight-traffic; not merely those living right next to the freight-lines, but all people living in close proximity to them. Yet the proposal's Environmental Assessment includes no information whatsoever regarding environmental impacts from the increase in freight-traffic.	Road traffic impacts are considered in EA Report Chapter 7 and rail in Chapter 8. The appropriate approach to the management of effects from the rail freight line corridor is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	788	**DoP Submission No 112**
Traffic	Noise and air pollution and traffic congestion will increase and fifty suburbs all over Sydney will be affected, including suburb in the Canterbury Local Government Area where I live. I urge the State Government to reconsider this infrastructure development proposal. I do not want an Inter-modal Logistics Centre in Enfield or the resulting damage to the environment and increase in pollution and traffic congestion.	These issues have been addressed as part of the EA. Impacts on regional basis will be negligible due to the limited numbers of trucks generated by the proposal in the context of the regional road network performance. The ILC contributes less than 1% to overall traffic volumes on the adjacent arterial road network. Noted.	789	**DoP Submission No 113**
Traffic	Rookwood has two authorised access points: at East Street Lidcombe opposite Victoria Street East and at Weeroona Road Strathfield at the point where Weeroona Road turns from East-West to North-South. The southern side the East-West leg of Weeroona Road is taken up by the Sydney Letters Facility and the northern side by Strathfield Council Depot. Weeroona Road, Strathfield terminates at a point about 200m south of the Sydney Letter Facility. It does not traverse the southern boundary of Rookwood as shown in Fig.7-2, Ch.7. Our traffic measurements show the gate on our Strathfield side provides for 60% of traffic entering and leaving Rookwood. This is reflected in normal traffic flows of between 3000 and 3600 vehicles between the hours of 9.00am and 4.30pm with peak flows of 20,000 between 10 00am and. 1.00pm on special days such as Mothers Day. 3. It is not unusual to see a funeral cortege waiting to turn right into Weeroona Road with the end of the cortege blocking the through lane on Centenary Drive because the RTA turning bay is too short. 4. Preference is given by RTA traffic lights to Centenary drive traffic at, the intersection of Weeroona Road. This	Noted. Noted. Advice indicates that this has no affect on the traffic assessment. Noted Noted. The ILC would not add to the traffic using this turn bay. This is a matter to take up with the RTA and Council, and would not be affected by the ILC.	790	**DoP Submission No 137**

Issue Category	Comments	Response	Stakeholder ID	Name
	causes corteges to become fragmented, as they turn right through traffic lights, This also occurs now in off peak periods. It causes stress among mourners who lose their way inside Rookwood.			
	5. Vehicles in funeral corteges generally depart en masse. Annually more than 5,200 funerals are conducted, and more than 1.3M people visit Rookwood.	Noted.		
	6. Traffic exiting Rookwood must share the narrow lanes of the railway overpass close to Centenary Drive. This often is not possible, as the large trucks operated by Australian Post at the Sydney Letters Facility cannot fit in the lanes of a bridge originally designed for two lanes and subsequently divided into three lanes. The delays in exiting Rookwood become more frequent as the number of large AP trucks increase.	This issue is independent of the ILC.		
	7.;Delays for exiting traffic are exacerbated further by unlimited parallel parking on the northern side of Weeroona Road and the short traffic light phasing at Weeroona Rd/Centenary Dr intersection. The upshot of point Nos 6 and 7 is that exiting funeral traffic banks up Memorial Avenue, Rookwood for hundreds of metres. (75% of cemetery traffic using the Strathfield gate flows along Memorial Avenue, as it is the route to the Crematorium and Catholic .Cemeteries.)	This issue is independent of the ILC.		
	'9. The above numbered points describe existing traffic problems. The Road Traffic & Transport studies in the EA show the status quo will be deteriorated further by: 10. Failing to take account of the traffic problems mentioned above and failing to recognize the needs of the bereaved and mourners in funeral corteges.	This issue is independent of the ILC.		
	11. Increasing certainty that the intersections at Arthur Street/Centenary Dr; Hume Hwy/Centenary Dr and Hume Hwy/Cosgrove Rd will fall below category C of Table 7-1 (EA Ch.7 Sinclair Knight Merz, [SKM] page7-5).	These intersections are forecast to expect diminished level of performance in the future due to natural background traffic growth, regardless of the ILC development.		
	12. That, given that the traffic lights are biased to the Centenary Dr flow, the average delay per vehicle for cemetery traffic at Weeroona Rd/Centenary Dr. is worse than category B now and will deteriorate under the effects of the proposed project,	Level of Service is a measure of the weighted average delay experienced by all vehicles using an intersection during a 1-hour period. So it may be that despite delays on one or more legs of an intersection, an acceptable level of service is demonstrated. The ILC contributes less than 1% of overall traffic volumes on the adjacent arterial road network		
	13.The traffic study by SKM is based on compounded assumptions making the conclusions and sensitivity estimates less reliable.	The traffic study was based on industry normal practice. The assumptions used and the sensitivity analysis is documented in the EA. The 2005 traffic volumes were based on surveys conducted by an independent survey company.		

Issue Category	Comments	Response	Stakeholder ID	Name
		All relevant assumptions regarding traffic generation by the ILC were taken into account based on current industrial/logistics knowledge.		
	14. The traffic study suggests that an undefined rate of "natural" traffic growth will congest a number of intersections used by funeral and cemetery traffic and the ILC Enfield will make no difference. This tends to remove responsibility for upgrading intersections from the project proposers to the RTA. We are left wondering how long major intersections such as Hume Hwy/Centenary Ave and Arthur St/Centenary Ave would be left to congest before the RTA took •remedial action and even whether it would be possible to increase their capacity.	Traffic volumes continue to grow for many reasons including increased population, development and redevelopment of sites in existing areas, and increased mobility. It is prudent to allow for this when predicting future traffic conditions. The ILC contributes less than 1% of overall traffic volumes on the adjacent arterial road network.		
	15.Although the traffic study indicates low numerical increases in traffic following the commissioning of the ILC Enfield, there does not appear to be recognition that these increments in traffic volumes represent slow-to-roll heavy vehicles a significant portion of which are longer than six cars.	The different operating characteristics of heavy vehicles have been incorporated into the traffic analysis presented in the EA.		
Traffic	Rat running is common in the area and with streets such as water (Enfield), Burwood Rd (Belfield and Belmore) being narrowed the hold ups are already a problem. Face to face everyone I speak with agrees the increase in traffic is a big worry and then the plan is to go ahead regardless of what we poor bloody rate payers think. Need I mention the radio traffic reports to tell us Roberts Rd, Centenary Drive etc have traffic hold-ups nearly every day?	Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety one of the key considerations.	87	**DoP Submission No 102**
Traffic	We believe the location of the proposed Centre is extremely inappropriate. This is a major concern as we know our Property's price value will dramatically decrease due to increased traffic and noise. We are very concerned about our family's safety and health due to the high levels of truck movement, queuing and pollution.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in The traffic study was based on industry normal practice. The assumptions used and the sensitivity analysis is documented in the EA report Chapter 17. Traffic, noise, air quality and potential impacts on health and wellbeing are considered in The traffic study was based on industry normal practice. The assumptions used and the sensitivity analysis is documented in the EA.Report. Chapters 7,11,12 and 17. Impacts on air and noise from the operation of the site are acceptable within relevant guidelines and should have no implications for public health. Construction and Operation Environment Management Plans would be implemented to manage identified impacts.	792	**DoP Submission No 116**

Issue Category	Comments	Response	Stakeholder ID	Name
Traffic	It will be a large and noisy traffic generating development right in the centre of suburban western Sydney between Belfield, South Strathfield and Greenacre suburbs where a lot of people live and work and where there is already a great deal of through traffic with Roberts Rd, the Hume Hwy and Georges River Rd being major traffic arteries. Over 200 dwellings were built in 1992 on the corner of Roberts Rd and Norfolk Rd where the intersection is with Wentworth St, the roadway which will carry 70% of traffic from the ILC. I fail to see how adding more truck traffic to Roberts Rd and the Hume Hwy is going to be possible without dangerous gridlock occurring. The traffic that will be generated by this development does not begin and end at the entrance to the ILC but fans out across the metropolitan area especially metropolitan west. I as a Greenacre resident expect to experience more traffic delays, dangers and frustrations when trying to exit or enter Greenacre from Roberts Rd via Norfolk RD.	ILC operation traffic impacts have been modelled. Further details are provided in The traffic study was based on industry normal practice. The assumptions used and the sensitivity analysis is documented in the EA. Report Chapter 7. Traffic would be managed through the Local Area Traffic Management Plan which would also prohibit trucks from using residential streets and would be prepared with due consideration of access issues. The increase of traffic on Roberts Rd will be low in the context of traffic already on the road and in the future.	793	**DoP Submission No 147**
Traffic	The development could cause many hazardous implications such as: movement of heavy road traffic (trucks, semi trailers) freight movements. Increased road traffic hazards, traffic congestion on residential roads	Accident rates and other road safety issues were considered in the EA. Pedestrian safety would be considered during preparation of the Local Area Traffic Management Plan. An Emergency Response and Incident Management Plan would also be prepared for the site. Trucks would be prevented from entering residential streets.	810	**DoP Submission No 168**
Traffic	We oppose the proposal as we already have trucks and semis at the moment and do not which (sic) to increase more pollution and noise	Noted.	796	**DoP Submission No 169**
Traffic	The building of the ILC is substantial and will result in a large increase in semi-trailer truck movement in the Enfield area. Our local roads are already filled with traffic. The main roads in this area, the M5, Centenary Drive and King Georges Rd are already congested and very little public transport infrastructure has been added to alleviate this problem. It doesn't make sense to add to this problem by building an Intermodal, which due to lack of road infrastructure will probably not be able to run efficiently. Since local roads are already congested, there is a concern that car drivers will increasingly use residential roads to avoid the traffic.	ILC operation traffic impacts have been modelled, further details are provided in EA Report, Chapter 7. The increase of traffic on arterial roads will be very low in the context of traffic already on the roads and in the future. Traffic would be managed through the Local Area Traffic Management Plan which would also prohibit trucks from using residential streets and would be prepared with due consideration of access issues.	809	**DoP Submission No 123**

Issue Category	Comments	Response	Stakeholder ID	Name
Traffic	Huge increase/volume of trucks that will use present infrastructure (roads) which cannot cope. Not all trucks will use Roberts Rd exit and use Cosgrove Rd. Roads are overused presently, it will be sheer horror.	ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. The increase of traffic on Cosgrove Rd will have few implications on the intersection performance. Problems may result from the natural growth of traffic on Hume Highway.	798	**DoP Submission No 174**
Traffic	Obviously there will be more trucks and semi trailers going down Liverpool Road, probably even at night. Liverpool Road is already very congested, especially during peak/hours. If during those times you are forced to use Liverpool Road you often wonder if it would not be quicker to walk. Inconvenience: because of this traffic the trucks and semitrailers would slow us down even more.	ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. The increase of traffic on Hume Hwy will be very low in the context of traffic already on the road and in the future.	799	**DoP Submission No 139**
Traffic	I request that a reconsideration of this plan be made as we are already fully / congested with noise and air pollution from the heavy traffic. This development will definitely increase the current problem.	Impacts on air and noise from the operation of the site are acceptable within relevant guidelines and should have no implications for public health. Operation Environmental Management Plans would be implemented to address any potential impacts.	800	**DoP Submission No 146**
Traffic	A main worry to us is the closure of Cosgrove Road at the intersection with Punchbowl Road. This acts as the outlet for the people in the area as it is light controlled and we do not have to battle with chaos of Punchbowl Road. Most of our access to Bankstown and Chullora is through this outlet.	This intersection will not be closed. Heavy vehicles from the IILC will be prevented from travelling through the intersection, but no other vehicles will be affected.	802	**DoP Submission No 118**
Traffic	The purpose of this submission is to object to the proposal. Reasons for the objection of this proposal include: Increased in traffic in the area.	ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. The increase of traffic on arterial roads will be low in the context of traffic already on the roads and in the future.	803	**DoP Submission No 153**
Traffic	Liverpool Road is quite congested at the best of times. Now you want still to add countless trucks and semi-trailers and pollution	ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. The increase of traffic on arterial roads will be low in the context of traffic already on the roads and in the future.	804	**DoP Submission No 155**
Traffic	Important data and presumptions contained in the EA are flawed. Traffic data contained in the EA conflicts with data collected by Council's own traffic engineers. These anomalie, that are of great concern, jeopardise the accuracy of the EA and are detailed in Council's submission on the project. Council's traffic engineers have demonstrated throughout our submission that many of our roads and major intersections are already operating at capacity. It does not make sense, to place further pressure on these roads and also puts at risk the successful operation of an Intermodal Logistics Centre at this location The modelling of air quality and noise impacts from road traffic and the conclusion that no significant impact will	A response to Council's data is provided separately in the Council response section. The results presented in the EA are valid. Impacts on air and noise from the operation of the site are acceptable within relevant guidelines and should have no implications for public health.	838	**DoP Submission No 173,150**

Issue Category	Comments	Response	Stakeholder ID	Name
	result from road traffic are also seriously questioned due to inaccurate traffic volume data.			
Traffic	Any use of the Enfield Marshalling Yards as a freight terminal should not be approved. The site is completely unsuitable for such facility given its proximity residential areas and the adverse community and environmental impacts the redevelopment would create. It would have disastrous impacts on our community, our environment and on our roads. Sydney Ports proposal would have severe impact on the health of the residents as well as traffic flow within 10km radius of the site causing traffic jam, noise, air and lighting pollution for nearby residents. As you know Traffic at Robert Road and Hume Highway (Liverpool Road) are running at full capacity specially during business hours (06:00 Hrs onwards) and there are no rooms for any additional traffic (trucks and semi trailers) to add on to these two roads. • We are really concerned that extra traffic generated by the Logistic Centre will spill into the residential areas of surrounding suburbs. • Dramatic increases in the number of trucks (an extra 900 semi-trailers / day) going along our roads and rail to and around from the site as under the proposal will result in more traffic, more pollution, more noise, increased risk of road accidents and loss of property values.	Land use immediately surrounding the site is predominantly industrial, further details are provided in EA Report Chapter 14. Impacts on roads and community are discussed in EA Report Chapters 7 and 17. Impacts on air and noise from the operation of the site are acceptable within relevant guidelines and should have no implications for public health. Traffic modelling showed that the contribution to the Hume Highway operation by the ILC would be of no significance in the overall performance. The Local Area Traffic Management Plan would include measures to prevent trucks from using residential streets. Traffic, noise, air quality and potential impacts on health and wellbeing are considered in EA report, chapters 7,11,12 and 17. Impacts on air and noise from the operation of the site are acceptable within relevant guidelines and should have no implications for public health. Construction and Operation Environment Management Plans would be implemented to manage identified impacts. Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	794	**DoP Submission No 117**
Traffic	The additional traffic generated by this ILC will overwhelm the major roads and will result in many vehicles using side streets. All this additional traffic will result in more accidents and add significantly to air pollution	Traffic, noise, air quality and potential impacts on health and wellbeing are considered in EA Report,chapters 7,11,12 and 17. Construction and Operation Environment Management Plans would be implemented to manage identified impacts. Safety would be a key consideration during preparation of the Local Area Traffic Management Plan.	840	**DoP Submission No 322**

Issue Category	Comments	Response	Stakeholder ID	Name
Traffic	This proposal should not go ahead in a quiet residential area like Enfield. Dramatic increases in the number of trucks going along roads to and from the site, the increased pollution, increased noise and increased congestion hence greater road accidents.	Traffic, noise, air quality and potential impacts on health and wellbeing are considered in Chapters 7,11,12 and 17. Construction and Operation Environment Management Plans would be implemented to manage identified impacts. Safety would be a key consideration during preparation of the Local Area Traffic Management Plan.	841	**DoP Submission No 323**
Traffic	This proposal should not go ahead in a quiet residential area like Enfield. Dramatic increases in the number of trucks going along roads to and from the site, the increased pollution, increased noise and increased congestion hence greater road accidents. On page 8 of the Executive summary "the assessment found that there would be about 1,160 truck movements into and out of the site per day' The majority of these would be between 6am and 5pm, with a daily peak of 103 movements between 2pm&3pm. " The Cosgrove -Hume Hwy intersection is already one of the busiest in Sydney and is highly congested between 8am - 10 am and 2pm - 4pm. So when you add additional trucks form the logistics centre you have chaos. In a media release on Jan 17 Greg Martin stated " Sydney ports Corporation is working with traffic modelling experts to design the best possible system" You mean to tell me that a traffic management plan still hasn't been devised. Well of course not traffic is not a Sydney Ports problem it is an Rat's. So build the development and worry about traffic later even if it causes significant damage and accidents.	Traffic, noise, air quality and potential impacts on health and wellbeing are considered in Chapters 7,11,12 and 17. Construction and Operation Environment Management Plans would be implemented to manage identified impacts. Safety would be a key consideration during preparation of the Local Area Traffic Management Plan. The Hume Highway / Cosgrove Road intersection would provide a secondary access point to the ILC, necessary for safety and operational reasons. The main cause of congestion at this intersection is the absence of a 3rd eastbound lane on the Hume Highway. The small proportion of ILC traffic that would use this intersection would not exacerbate this situation. Further consideration of traffic issues would be undertaken during detailed design and during preparation of the LATM plan.	66	**DoP Submission No 324**
Traffic	This proposal should not go ahead in a quiet residential area like Enfield. Dramatic increases in the number of trucks going along roads to and from the site, the increased pollution, increased noise and increased congestion hence greater road accidents.	Traffic, noise, air quality and potential impacts on health and wellbeing are considered in Chapter 7 of the EA report. The increase of traffic on arterial roads will be very low in the context of traffic already on the roads and that will be on the roads in the future. Construction and Operation Environment Management Plans would be implemented to manage identified impacts. Safety would be a key consideration during preparation of the Local Area Traffic Management Plan.	842	**DoP Submission No 325**

Issue Category	Comments	Response	Stakeholder ID	Name
Traffic	Traffic chaos	Traffic issues are considered in Chapters 7. Construction and Operation Environment Management Plans would be implemented to manage identified impacts. Safety would be a key consideration during preparation of the Local Area Traffic Management Plan.	843	**DoP Submission No 167**
Traffic	Proposal will take thousands of trucks off the main intercity highways, no doubt reducing road accidents and wear and tear of the highways themselves	Noted.	574	**DoP submission No 6**
Traffic	The map (Executive summary figure 1) showing the purported distribution of material from the Port Enfield to the west and south west is fanciful. It completely ignores the bringing of goods from the north, east and south to join containers going to Botany The traffic transportation modelling shows huge increases in heavy vehicle movements east of the site on the Hume Highway, my and my parents local arterial road in the AM and PM peaks. There is no prohibition on turning right onto the Hume Highway after exiting on Roberts Rd or on Cosgrove Rd	Container cargo distribution is discussed in EA Report chapter 3. The ILC will contribute less than 1% of overall traffic volumes on the adjacent arterial road network. These are state roads and these turning movements are not prohibited.	856	**DoP submission number 329**

Issue Category	Comments	Response	Stakeholder ID	Name
Vibration	The report states that "construction and operation activities at the site would cause ground vibration but are unlikely to cause significant ground vibration beyond 25m from the source" and that 'the potentially affected residential premises to the proposed ILC are approximately 50m away" How can this not be an issue? You are kidding right? A development of this size would cause greater impact than 25 metres, more closer to 100metres which would definitely impact residential areas and cause significant damage to property and health. Will Sydney ports be responsible for the damage bill.	Vibration was addressed in the EA. The types of activities carried out on site during both construction and operation are unlikely to cause significant ground vibration beyond 25 m from the source. Given that the nearest potentially affected premises to the ILC are more than 50 m away, it is unlikely that ground vibration will be an issue on this site. There will be no substantial change in truck traffic volumes on any road near residential areas. Therefore, there will be no change in existing vibration conditions due to traffic.	841	**DoP Submission No 323**
Vibration	Further, within the Environmental Assessment itself, there is no mention of provisions to guard against the huge increase in noise, pollution and vibration that will directly affect myself and other residents living near the freight line in Marrickville. The provision of noise walls or sound barriers etc along residential areas appears to be a reasonable minimum requirement should your project go ahead regardless of tax payers' dissent.	The appropriate approach to the management of effects from the rail freight line through is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	831	**DoP Submission No 316**
Vibration	You can't even imagine how much noise, dust, vibration, pollution will be experienced by us. Even before the actual functioning starts, there will be so much construction traffic that our life would be made hell. I can imagine how much noise, vibration, pollution, dust would be generated by this. Its simply not a viable idea.	Vibration was addressed in the EA. The types of activities carried out on site during both construction and operation are unlikely to cause significant ground vibration beyond 25 m from the source. Given that the nearest potentially affected premises to the ILC are more than 50 m away, it is unlikely that ground vibration will be an issue on this site. There will be no substantial change in truck traffic volumes on any road near residential areas. Therefore, there will be no change in existing vibration conditions due to traffic.	542	**DoP Submission No 122**
Vibration	There is no mention of provisions against the huge increase in noise, pollution and vibration that will directly affect all residents along the freight lines: The provision of noise walls or sound barriers along residential areas should appear as a reasonable minimum requirement if the project were to go ahead regardless of tax-payers' dissent.	The appropriate approach to the management of effects from the rail freight line through is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	788	**DoP Submission No 112**
Vibration	At times, we now experience vibrations in our home when trains and large freight trucks pass by and the construction has not even commenced. We can only imagine what they would be like once the proposal is granted.	Vibration was addressed in the EA. The types of activities carried out on site during both construction and operation are unlikely to cause significant ground vibration beyond 25 m from the source. Given that the nearest potentially affected premises to the ILC are more than 50 m away, it is unlikely that ground vibration will be an issue on this site. There will be no substantial change in truck traffic volumes on any road near residential areas. Therefore, there will be no change in existing vibration conditions due to traffic.	711	**DoP Submission No69**

Issue Category	Comments	Response	Stakeholder ID	Name
Vibration	It is noted that the EA looks at ground vibration but does not cover rail line vibration. While this may be good enough for ILC Enfield. The Min for Planning should look very carefully at determining the speed at which these goods trains should travel, to reduce the amount of ground vibrations that are currently being experienced by people living next to rail lines carrying freight.	The appropriate approach to the management of effects from the rail freight line through is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor..	597	**DoP Submission No 21**

Issue Category	Comments	Response	Stakeholde ID	Name
Form Letter 1 DoP Submission Numbers are: 20,30,47,48,49,50,51,52,53,54,55,56,59,60,63,64,74,78,79,81,82,83,84,85,86,87,88, 89,90,91,92,104,105,107,108,111,114,115,126,127,128,134,144,145,148 Stakeholder numbers 568,600,601,602,603,604,605,606,607,609,610,660,612,613,614,615,616,617,619,624,632,634,635,792,637,639,640,37,643,644,645,647,648,650,651,652,653,654,655,656,657,658,659,660,661				
Noise	Further, within the Environmental Assessment itself, there is no mention of provisions to guard against the huge increase in noise, pollution and vibration that will directly affect myself and other residents living near the freight line in Marrickville. The provision of noise walls or sound barriers etc along residential areas appears to be a reasonable minimum requirement should your project go ahead regardless of tax payers' dissent.	The appropriate approach to the management of noise from the rail freight line through Marrickville is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. The increases in noise discussed in the EA Report are not huge.		

Submissions Form letter 1: CONSULTATION PROCESS

Issue Category	Comments	Response	Stakeholder ID	Name
Form Letter 1 DoP submission numbers are: 20,30,47,48,49,50,51,52,53,54,55,56,59,60,63,64,74,78,79,81,82,83,84,85,86,87,88, 89,90,91,92,104,105,107,108,111,114,115,126,127,128,134,144,145,148 Stakeholder numbers 568,600,601,602,603,604,605,606,607,609,610,660,612,613,614,615,616,617,619,624,632,634,635,792,637,639,640,37,643,644,645,647,648,650,651,652,653,654,655,656,657,658,659,660,661				
Consultation Process	It is also imperative that Sydney Ports consult with those residents that would be most affected by these proposals, something they have declined to do thus far.	Consultation with the community was undertaken during the preparation of the EA. Further consultation will be undertaken during both construction and operational phases of the project. The consultation will include the establishment of Community Liaison Groups. Details of this proposed consultation are outlined in the Statement of Commitments.		

Issue Category	Comments	Response	Stakeholder ID	Name
Form Letter 1 DoP Submission Numbers are: 20,30,47,48,49,50,51,52,53,54,55,56,59,60,63,64,74,78,79,81,82,83,84,85,86,87,88, 89,90,91,92,104,105,107,108,111,114,115,126,127,128,134,144,145,148 Stakeholder numbers 568,600,601,602,603,604,605,606,607,609,610,660,612,613,614,615,616,617,619,624,632,634,635,792,637,639,640,37,643,644,645,647,648,650,651,652,653,654,655,656,657,658,659,660,661				
pollution	Further, within the Environmental Assessment itself, there is no mention of provisions to guard against the huge increase in noise, pollution and vibration that will directly affect myself and other residents living near the freight line in Marrickville. The provision of noise walls or sound barriers etc along residential areas appears to be a reasonable minimum requirement should your project go ahead regardless of tax payers' dissent.	The appropriate approach to the management of pollution from the rail freight line through Marrickville is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. The increases discussed in the EA report are not huge.		

Submissions Form letter 1: RAIL ISSUES

Issue Category	Comments	Response	Stakeholder ID	Name
Form Letter 1 DoP Submission Numbers are: 20,30,47,48,49,50,51,52,53,54,55,56,59,60,63,64,74,78,79,81,82,83,84,85,86,87,88, 89,90,91,92,104,105,107,108,111,114,115,126,127,128,134,144,145,148 Stakeholder numbers 568,600,601,602,603,604,605,606,607,609,610,660,612,613,614,615,616,617,619,624,632,634,635,792,637,639,640,37,643,644,645,647,648,650,651,652,653,654,655,656,657,658,659,660,661				
Rail Issues	The Environmental Assessment does not include any information on the environmental impacts from the increase in train numbers on the freight line as a result of this proposal and the ongoing expansion of Port Botany.	Environmental impacts associated with rail movements along the freight line are contained in chapter 11(noise) and chapter 12 (air) of the EA report. The appropriate approach to the management of effects from the rail freight line corridor is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC is prepared to work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. Train movements would be the same whether the ILC is approved or not.		

Submissions Form letter 1: REJECT PROPOSAL

Issue Category	Comments	Response	Stakeholder ID	Name
Form Letter 1 DoP Submission Numbers are: 20,30,47,48,49,50,51,52,53,54,55,56,59,60,63,64,74,78,79,81,82,83,84,85,86,87,88, 89,90,91,92,104,105,107,108,111,114,115,126,127,128,134,144,145,148 Stakeholder numbers 568,600,601,602,603,604,605,606,607,609,610,660,612,613,614,615,616,617,619,624,632,634,635,792,637,639,640,37,643,644,645,647,648,650,651,652,653,654,655,656,657,658,659,660,661				
Reject Proposal	I wish to voice my objection to the proposed Enfield Intermodal Logistics Centre. Application ref.no. 05-0147.	Noted.	610	

Submissions Form letter 1: Vibration

Issue Category	Comments	Response	Stakeholder ID	Name
Form Letter 1 DoP Submission Numbers are: 20,30,47,48,49,50,51,52,53,54,55,56,59,60,63,64,74,78,79,81,82,83,84,85,86,87,88, 89,90,91,92,104,105,107,108,111,114,115,126,127,128,134,144,145,148 Stakeholder numbers 568,600,601,602,603,604,605,606,607,609,610,660,612,613,614,615,616,617,619,624,632,634,635,792,637,639,640,37,643,644,645,647,648,650,651,652,653,654,655,656,657,658,659,660,661				
Vibration	Further, within the Environmental Assessment itself, there is no mention of provisions to guard against the huge increase in noise, pollution and vibration that will directly affect myself and other residents living near the freight line in Marrickville. The provision of noise walls or sound barriers etc along residential areas appears to be a reasonable minimum requirement should your project go ahead regardless of tax payers' dissent.	The increase in vibration The appropriate approach to the management of noise and vibration from the rail freight line through Marrickville involves all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.		

SUBMISSIONS FORM LETTERS 2,3,4

IssueCategory	Comments	Response	StakeholderID	Name
amenity/quality of life	Since the end of the steam train era, Belfield and surrounding areas have been clean quiet and peaceful. This peaceful lifestyle is going to come to an abrupt end thanks to the State Government and the SPC.	Steam trains are not being considered for the project. Further consideration of the impacts on amenity, wellbeing and quality of life are considered in Chapter 17 of the EA Report.	820	**Submission 80**
amenity/quality of life	Since the end of the steam train era, Belfield and surrounding areas have been clean quiet and peaceful. This peaceful lifestyle is going to come to an abrupt end thanks to the State Government and the SPC.	Steam trains are not being considered for the project. Further consideration of the impacts on amenity, wellbeing and quality of life are considered in Chapter 17 of the EA Report.	494	**Submission 71,75**
amenity/quality of life	It would have disastrous impacts on our community, our environment and our roads. I urge you to act and alter the proposal for the Enfield site that has the potential to destroy the quality of life of residents living in inner western Sydney	Further consideration of the impacts on amenity, wellbeing and quality of life are considered in Chapter 17 of the EA Report. Traffic impacts are considered in Chapter 7.	813	**Submission 34**
amenity/quality of life	It would have disastrous impacts on our community, our environment and our roads. I urge you to act and alter the proposal for the Enfield site that has the potential to destroy the quality of life of residents living in inner western Sydney	Further consideration of the impacts on amenity, wellbeing and quality of life are considered in Chapter 17 of the EA Report. Traffic impacts are considered in Chapter 7.	819	**Submission 28 & 96**

Submisions Form letters 2,3 &4 ALTERNATIVE SITES

IssueCategory	Comments	Response	StakeholderID	Name
Alternative Sites	There are viable alternatives to and for the Enfield site.	Alternative sites are considered in Chapter 3 of the EA Report. The site chosen is the most appropriate, given the location, size and access to road and rail networks.	813	**Submission 34**
Alternative Sites	There are viable alternatives to and for the Enfield site.		819	**Submission 28 & 96**

SUBMISSIONS FORM LETTERS 2,3,4 ESD

IssueCategory	Comments	Response	StakeholderID
ESD	Any use of the Enfield Marshalling Yards as a freight terminal should only need approved if it is economically viable and economically sustainable	The economic benefits of the project are described in Chapter 22 and Appendix J of the EA. SPC has addressed the financial viability of the project and is prepared to commit funding to the project.	813 **Submission 34**
ESD	Any use of the Enfield Marshalling Yards as a freight terminal should only need approved if it is economically viable and economically sustainable		819 **Submission 28 & 96**

SUBMISSION FORM LETTERS 2,3,4 NOISE

IssueCategory	Comments	Response	StakeholderID	Name
Noise	We are going to need a lot of noise walls and mounds if you are going to insulate us in any way.	Noise mitigation measures are discussed in EA Report chapter 11.Further consideration of detailed noise mitigation measures would be undertaken during preparation of the Noise Management Plans for construction and operation.	808	**Submission 165**
Noise	We are going to need a lot of noise walls and mounds if you are going to insulate us in any way. Let's see you've got your terminal and we've got more pollution, unbearable noise and devaluation of property.	Further consideration of detailed noise mitigation measures would be undertaken during preparation of the Noise Management Plans for construction and operation. Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in EA Report Chapter 17.	628	**Submission 160,44**
Noise	We are going to need a lot of noise walls and mounds if you are going to insulate us in any way. Let's see you've got your terminal and we've got more pollution, unbearable noise and devaluation of property.	Further consideration of detailed noise mitigation measures would be undertaken during preparation of the Noise Management Plans for construction and operation. Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in EA Report Chapter 17.	627	**Submission 37**

Submissions Form letter 2,3, 4 POLLUTION

IssueCategory	Comments	Response	StakeholderID	Name
pollution	I acknowledge the economic importance to NSW of being able to cater for an expected increase in containerised trade over the coming decades. However I am particularly concerned about the wider environmental and health impacts of vastly increasing the movement of freight in our region.	Regional freight issues and the freight rail network needs to be considered by Government as a whole. Further consideration of the impacts on amenity, wellbeing and quality of life are considered in Chapter 17 of the EA Report. Further information on project justification is provided in EA Report Chapter 22.	813	**Submission 34**
pollution	I acknowledge the economic importance to NSW of being able to cater fro an expected increase in containerised trade over the coming decades. However I am particularly concerned about the wider environmental and health impacts of vastly increasing the movement of freight in our region.	Regional freight issues and the freight rail network needs to be considered by Government as a whole. Further consideration of the impacts on amenity, wellbeing and quality of life are considered in Chapter 17 of the EA Report. Further information on project justification is provided in EA Report Chapter 22.	819	**Submission 28 & 96**
pollution	Let's see, you've got your terminal and we've got more pollution, unbearable - noise and devaluation of property	Noise impacts are considered in EA Report Chapters 11 .Noise mitigation and other pollution control measures have been proposed for the site which would be further developed during detailed design and during preparation of the Construction and Operation Environmental Management Plans. Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in EA Report Chapter 17.	808	**Submission 165**
pollution	Let's see you've got your terminal and we've got more pollution.	Pollution and noise impacts are considered in Chapters 11 and 12. Noise mitigation and other pollution control measures have been proposed for the site which would be further developed during detailed design and during preparation of the Construction and Operation Environmental Management Plans.	628	**Submission 160,44**

Submissions Form letter 2,3, 4 POLLUTION

pollution	Let's see you've got your terminal and we've got unbearable noise	Pollution and noise impacts are considered in EA Report Chapters 11 and 12. Noise mitigation and other pollution control measures have been proposed for the site which would be further developed during detailed design and during preparation of the Construction and Operation Environmental Management Plans.	627	**Submission 37**

Submissions Form letters 23&4 PROPERT IMPACT

IssueCategory	Comments	Response	StakeholderID	Name
Property Impact	Should this project proceed, will the residents be compensated for such things as home insulation and any reduction in property values	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17. Potential impacts and mitigation measures would be further considered during preparation of the Construction and Operation Environmental Management Plans.	820	**Submission 80**
Property Impact	Should this project proceed, will the residents be compensated for such things as home insulation and any reduction in property values	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17. Potential impacts and mitigation measures would be further considered during preparation of the Construction and Operation Environmental Management Plans.	494	**Submission 71, 75**
Property Impact	Let's see, you've got your terminal and we've got more pollution, unbearable - noise and devaluation of property	Pollution and noise impacts are considered in Chapters 11 and 12. Noise mitigation measures have been proposed for the site which would be further developed during detailed design and during preparation of the Construction and Operation Environmental Management Plans.	808	**Submission 165**
Property Impact	Let's see you've got your terminal and we've got devaluation of property.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	628	**Submission 44.160**
Property Impact	Let's see you've got your terminal and we've got devaluation of property.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	627	**Submission 37**

SUBMISSIONS FORM LETTERS 2,3 &4 REJECT

IssueCategory	Comments	Response	StakeholderID	Name
Reject Proposal	We strongly object to the proposed ILC at Enfield for several reasons including noise pollution, traffic congestion and property devaluation.	Noted.	820	**Submission 80**
Reject Proposal	We strongly object to the proposed ILC at Enfield for several reasons including noise pollution, traffic congestion and property devaluation.	Noted.	494	**Submission 71,75**
Reject Proposal	I definitely object to the proposal.	Noted.	808	**Submission 165**
Reject Proposal	The proposed terminal is going to have a horrendous effect on Greenacre residents of which I have been one for 39 years.	The potential for impact on local residents in terms of amenity, quality of life and wellbeing is considered in Chapter 17.	628	**Submission 44,160**
Reject Proposal	the proposed terminal is going to have a horrendous effect on Greenacre residents of which I have been one for 39 years.	The potential for impact on local residents in terms of amenity, quality of life and wellbeing is considered in Chapter 17.	627	**Submission 37**

SUBMISSIONS FORM LETTERS 2,3 &4 SITE QUALITIES

IssueCategory	Comments	Response	StakeholderID
Site qualities	The site is completely unsuitable for a facility of such a scale, given its proximity to residential areas and the adverse community and environmental impacts the redevelopment would create.	Alternative sites are considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. A series of mitigation and management measures would be implemented during construction and operation to ensure minimal impacts on sensitive receivers in the vicinity.	813 **Submission 34**
Site qualities	The site is completely unsuitable for a facility of such a scale, given its proximity to residential areas and the adverse community and environmental impacts the redevelopment would create.		819 **Submission 28 & 96**

SUBMISSIONS FORM LETTER 2,3, &4 Socio economic

IssueCategory	Comments	Response	StakeholderID
Socio Economic	At least 75% more truck movements can't be good for our health	The increase in truck movements is less than 1%. Truck traffic would be restricted to arterial roads through the Local Area Traffic Management Plan. Further consideration of the potential for impact from on health, quality of life and wellbeing is provided in Chapter 17.	808 **Submission 165**
Socio Economic	At least 75% more truck movements can't be good for our health		628 **Submission 44,160**
Socio Economic	At least 75% more truck movements can't be good for our health		627 **Submission 37**

SUBMISSIONS FORM LETTER 2,3 &4 TRAFFIC

IssueCategory	Comments	Response	Stakeholder ID	Name
Traffic	Dramatic increases in the number of trucks going along our roads and rail to and from the site as under the proposal will result in more traffic, more pollution, more noise and increased risk of road accidents.	ILC operation traffic impacts have been modelled, further details are provided in EA report Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety the key consideration. Crash data was reviewed during preparation of the EA report. Further details are contained in EA report Chapter 7 and Appendix B. Noise, air quality and potential impacts on health and wellbeing are considered in EA Report Chapters 11, 12 and 17. Construction and Operation Environment Management Plans would be implemented to manage identified impacts.	813	
Traffic	Dramatic increases in the number of trucks going along our roads and rail to and from the site as under the proposal will result in more traffic, more pollution, more noise and increased risk of road accidents.	ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety the key consideration. Crash data was reviewed during preparation of the EA report. Further details are contained in EA Report Chapter 7 and Appendix B. Noise, air quality and potential impacts on health and wellbeing are considered in EA Report Chapters 11,12 and 17. Construction and Operation Environment Management Plans would be implemented to manage identified impacts.	819	
Traffic	I live near the intersection of Juno Parade and Roberts Road; it is already hard to sleep as the traffic never lets up, day and night.	Noted.	808	
Traffic	At least 75% more traffic movements can't be good for our health. I live near the intersection of Juno Pde and Roberts Rd; it is already hard to sleep as the traffic never lets up day and night.	Traffic generation by the ILC will resulting less than 1% increase in overall traffic in the area. Existing and future increases in truck movements will not be due to the ILC. ILC operation traffic impacts have been modelled, further details are provided in EA Report Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety the key consideration. Crash data was reviewed during preparation of the EA report. Further details are contained in EA Report Chapter 7 and Appendix B. Noise, air quality and potential impacts on health and wellbeing are considered in EA Report Chapters 11,12 and 17. Construction and Operation Environment Management Plans would be implemented to manage identified impacts.	628	

SUBMISSIONS FORM LETTER 2,3 &4 TRAFFIC

Traffic	At least 75% more traffic movements can't be good for our health. I live near the intersection of Juno Pde and Roberts Rd; it is already hard to sleep as the traffic never lets up day and night.	Traffic generation by the ILC will resulting less than 1% increase in overall traffic in the area Existing and future increases in truck movements will not be due to the ILC. ILC operation traffic impacts have been modelled, further details are provided in EA Report ,Chapter 7. Trucks would be prevented from using residential streets through the Local Area Traffic Management Plan which will be prepared with safety the key consideration. Crash data was reviewed during preparation of the EA report. Further details are contained in EA Report Chapter 7 and Appendix B. Noise, air quality and potential impacts on health and wellbeing are considered in EA Report Chapters 11,12 and 17. Construction and Operation Environment Management Plans would be implemented to manage identified impacts.	627	

DoP submission numbers Form letter 2
37,44, 160, 165
Stakeholder Nos Form letter 2
627, 628,628,808
DoP submission numbers Form letter 3
38,34,96
Stakeholder Nos Form letter 3
819,813,813
DoP submission numbers Form letter 4
71,75,80
Stakeholder Nos Form letter 4
494,494,820

Submissions Form letter 5: ALTERNATIVE SITES

Issue Category	Comments	Response	Stakeholder ID	Name
DoP submission numbers are: 185,186,187,188,189,190,191,192,193,194,195,196,197,198,199,200,201,202,203,204,205,206,207,208,209,210,211,212,213,214,215,216,217,218,219,220,221,222,223,224, 225 and 226 are duplicates,227,228,229,230,231,232,233,234,235,236,237,238,239,240,241,242,243,244,246,247,248,249, 250,251,252,253,254,255,256,257,258,259,260,261,262,263,264,265,266,26,7268,269270,271,272,273,274,275,276,277,278,279280,281,282,283,284,285,286287,288,289290,291,292,293,294,295,296,297,298,299 ,300,301,302,303,304,305,307,308,311,312,313,314 Stakeholder numbers 662,560,666,667,668,669,670,672,673,674,675,676,677,678,679,680,682,683,684,685,687,688,689,690,691,692,693,694,695,696,835,698,699,846,847,700,702,703,704,705,707, 707, 708,709,710,709,712,714,715,717,717,718,719,720,595,721,722,785,723,724,725,727,728,729,730,731,732,733,734,735,737,738,739,740,741,742,836,743,743,743,743,745,848,849,746,747,748,749,837,750,751, 752,753,850,754,755,756,757,758, 759,760,761,762,855,764,766,765,767,768,769,770,771,772,773,718,774,775,776,777,778,779,783,782,781,780				
Alternative Sites	There are other and better alternatives to and for the Enfield site.	Alternative sites are considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line. If 40% of all containers are to be moved by rail other ILCs will be needed in other catchment areas of Sydney, as recognised by the FIAB report, to service those areas.	712	

Issue Category	Comments	Response	Stakeholder ID	Name
DoP submission numbers are: 185, 186,187,188,189,190,191,192,193,194,195,196,197,198,199,200,201,202,203,204,205,206,207,208,209,210,211,212,213,214,215,216,217,218,219,220,221,222,223,224, 225 and 226 are duplicates,227,228,229,230,231,232,233,234,235,236,237,238,239,240,241,242,243,244,246,247,248,249, 250,251,252,253,254,255,256,257,258,259,260,261,262,263,264,265,266,26,7268,269270,271,272,273,274,275,276,277,278,279280,281,282,283,284,285,286287,288,289290,291,292,293,294,295,296,297,298,299,300,301,302,303,304,305,307,308,311,312,313,314 Stakeholder numbers 662,560,666,667,668,669,670,672,673,674,675,676,677,678,679,680,682,683,684,685,687,688,689,690,691,692,693,694,695,696,835,698,699,846,847,700,702,703,704,705,707, 707, 708,709,710,709,712,714,715,717,717,718,719,720,595,721,722,785,723,724,725,727,728,729,730,731,732,733,734,735,737,738,739,740,741,742,836,743,743,743,743,745,848,849,746,747,748,749,837,750,751, 752,753,850,754,755,756,757,758, 759,760,761,762,855,764,766,765,767,768,769,770,771,772,773,718,774,775,776,777,778,779,783,782,781,780				
amenity/quality of life	The site is in close proximity to established residential areas and intensification of use involving 24/7 road and rail use, light spill, night noise and airborne pollution will severely compromise amenity. Given the apparent absence of funding to develop a network of similar terminals beyond Enfield, the proposed Centre, if approved, would be subject to ever increasing demands for expansion, thus further eroding residential and environmental amenity. The proposed Intermodel Logistics Centre will affect every community along the rail freight line and road transport routes from Port Botany. The site is in close proximity to a number of local schools and will create health risks.	Amenity, wellbeing and quality of life are further considered in Chapter 17 of the EA Report. Noise and air pollution are considered in Chapters 11 and 12 of the EA Report. These studies show that amenity will be unaffected during operation of the proposed development as air and noise criteria set by DEC guidelines will be met during most operations. These criteria are health based and, as long as they are met, there is no reason why there should be a greater risk to the health of school children in the area. SPC is committed to achieving noise and air quality goals during operation. Construction impacts can be managed to achive a satisfactory level. Light spill was addressed in Chapter 16 and Appendix I of the EA and will be managed by the use of appropriate light fittings and levels. The increased traffic on the surrounding road network due to the proposal was discussed in Chapter 7 and Appendix B of the EA. It will be minimal. Traffic on the streets surrounding the ILC would be controlled through a Local Area Traffic Management Plan. Road safety will be managed through this process, and the risk of accidents for pedestrians will not change. The ILC will be capped at 300,000 TEU by virtue of the size of the site and the conditions of consent. The appropriate approach to the management of effects from the rail freight line through the area is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.		

Submissions Form letter 5: CONSULTATION PROCESS

Category	Comments	Response	Stakeholder ID	Name
DoP submission numbers are: 185,186,187,188,189,190,191,192,193,194,195,196,197,198,199,200,201,202,203,204,205,206,207,208,209,210,211,212,213,214,215,216,217,218,219,220,221,222,223,224, 225 and 226 are duplicates,227,228,229,230,231,232,233,234,235,236,237,238,239,240,241,242,243,244,246,247,248,249, 250,251,252,253,254,255,256,257,258,259,260,261,262,263,264,265,266,26,7268,269270,271,272,273,274,275,276,277,278,279280,281,282,283,284,285,286287,288,289290,291,292,293,294,295,296,297,298,299 ,300,301,302,303,304,305,307,308,311,312,313,314 Stakeholder numbers 662,560,666,667,668,669,670,672,673,674,675,676,677,678,679,680,682,683,684,685,687,688,689,690,691,692,693,694,695,696,835,698,699,846,847,700,702,703,704,705,707, 707, 708,709,710,709,712,714,715,717,717,718,719,720,595,721,722,785,723,724,725,727,728,729,730,731,732,733,734,735,737,738,739,740,741,742,836,743,743,743,743,745,848,849,746,747,748,749,837,750,751, 752,753,850,754,755,756,757,758, 759,760,761,762,855,764,766,765,767,768,769,770,771,772,773,718,774,775,776,777,778,779,783,782,781,780				
Consultation Process	Community consultation has also been poor.	The consultation requirements of the Department of Planning (as specified in the EA requirements) were met. Consultation with the community was undertaken during the preparation of the EA. Further consultation will be undertaken during both construction and operational phases of the project. The consultation will include the establishment of Community Liaison Groups. Details of this proposed consultation are outlined in the Statement of Commitments.		

Submissions Form letter 5: JUSTIFICATION FOR PROJECT

Issue Category	Comments	Response	Stakeholder ID	Name
DoP submission numbers are: 185,186,187,188,189,190,191,192,193,194,195,196,197,198,199,200,201,202,203,204,205,206,207,208,209,210,211,212,213,214,215,216,217,218,219,220,221,222,223,224, 225 and 226 are duplicates,227,228,229,230,231,232,233,234,235,236,237,238,239,240,241,242,243,244,246,247,248,249, 250,251,252,253,254,255,256,257,258,259,260,261,262,263,264,265,266,26,7268,269270,271,272,273,274,275,276,277,278,279280,281,282,283,284,285,286287,288,289290,291,292,293,294,295,296,297,298,299,300,301,302,303,304,305,307,308,311,312,313,314 Stakeholder numbers 662,560,666,667,668,669,670,672,673,674,675,676,677,678,679,680,682,683,684,685,687,688,689,690,691,692,693,694,695,696,835,698,699,846,847,700,702,703,704,705,707, 707, 708,709,710,709,712,714,715,717,717,718,719,720,595,721,722,785,723,724,725,727,728,729,730,731,732,733,734,735,737,738,739,740,741,742,836,743,743,743,743,745,848,849,746,747,748,749,837,750,751, 752,753,850,754,755,756,757,758, 759,760,761,762,855,764,766,765,767,768,769,770,771,772,773,718,774,775,776,777,778,779,783,782,781,780			
justification for project	Whilst I acknowledge the economic importance of moving from road to rail freight to cater for future increases in containerised trade, I am not at all confident that this proposal has been adequately planned, nor sufficient fund allocated to a.) upgrading of infrastructure to make the proposal economically viable, b.) safeguarding the environment or c.) ameliorating the effects on local communities.	The project as described is clearly justified in economic terms and in its ability to safeguard the local environment. Further information relating to justification for the project is provided in Chapter 22 of the EA Report.		

Submissions Form letter 5: PROPERTY IMPACT

Issue Category	Comments	Response	Stakeholder ID	Name
DoP submission numbers are: 185,186,187,188,189,190,191,192,193,194,195,196,197,198,199,200,201,202,203,204,205,206,207,208,209,210,211,212,213,214,215,216,217,218,219,220,221,222,223,224, 225 and 226 are duplicates,227,228,229,230,231,232,233,234,235,236,237,238,239,240,241,242,243,244,246,247,248,249, 250,251,252,253,254,255,256,257,258,259,260,261,262,263,264,265,266,26,7268,269270,271,272,273,274,275,276,277,278,279280,281,282,283,284,285,286287,288,289290,291,292,293,294,295,296,297,298,299,300,301,302,303,304,305,307,308,311,312,313,314 Stakeholder numbers 662,560,666,667,668,669,670,672,673,674,675,676,677,678,679,680,682,683,684,685,687,688,689,690,691,692,693,694,695,696,835,698,699,846,847,700,702,703,704,705,707, 707, 708,709,710,709,712,714,715,717,717,718,719,720,595,721,722,785,723,724,725,727,728,729,730,731,732,733,734,735,737,738,739,740,741,742,836,743,743,743,743,745,848,849,746,747,748,749,837,750,751, 752,753,850,754,755,756,757,758, 759,760,761,762,855,764,766,765,767,768,769,770,771,772,773,718,774,775,776,777,778,779,783,782,781,780				
Property Impact	Hundreds of millions of dollars will be wiped off residential property values. This is unacceptable.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.		

Issue Category	Comments	Response	Stakeholder ID	Name
DoP submission numbers are: 185,186,187,188,189,190,191,192,193,194,195,196,197,198,199,200,201,202,203,204,205,206,207,208,209,210,211,212,213,214,215,216,217,218,219,220,221,222,223,224, 225 and 226 are duplicates,227,228,229,230,231,232,233,234,235,236,237,238,239,240,241,242,243,244,246,247,248,249, 250,251,252,253,254,255,256,257,258,259,260,261,262,263,264,265,266,26,7268,269270,271,272,273,274,275,276,277,278,279280,281,282,283,284,285,286287,288,289290,291,292,293,294,295,296,297,298,299,300,301,302,303,304,305,307,308,311,312,313,314 Stakeholder numbers 662,560,666,667,668,669,670,672,673,674,675,676,677,678,679,680,682,683,684,685,687,688,689,690,691,692,693,694,695,696,835,698,699,846,847,700,702,703,704,705,707, 707, 708,709,710,709,712,714,715,717,717,718,719,720,595,721,722,785,723,724,725,727,728,729,730,731,732,733,734,735,737,738,739,740,741,742,836,743,743,743,743,745,848,849,746,747,748,749,837,750,751, 752,753,850,754,755,756,757,758, 759,760,761,762,855,764,766,765,767,768,769,770,771,772,773,718,774,775,776,777,778,779,783,782,781,780				
Socio Economic	The overall environmental, health and social costs of the proposal are unacceptably high.	Further information on the potential for impacts on health, amenity and quality of life are provided in Chapter 17. It is argued that these impacts can be managed and the overall environmental, health and social costs will be low and able to be managed by appropriate mitigation measures.		

Issue Category	Comments	Response	Stakeholder ID	Name
DoP submission numbers are: 185,186,187,188,189,190,191,192,193,194,195,196,197,198,199,200,201,202,203,204,205,206,207,208,209,210,211,212,213,214,215,216,217,218,219,220,221,222,223,224, 225 and 226 are duplicates,227,228,229,230,231,232,233,234,235,236,237,238,239,240,241,242,243,244,246,247,248,249, 250,251,252,253,254,255,256,257,258,259,260,261,262,263,264,265,266,26,7268,269270,271,272,273,274,275,276,277,278,279280,281,282,283,284,285,286287,288,289290,291,292,293,294,295,296,297,298,299,300,301,302,303,304,305,307,308,311,312,313,314 Stakeholder numbers 662,560,666,667,668,669,670,672,673,674,675,676,677,678,679,680,682,683,684,685,687,688,689,690,691,692,693,694,695,696,835,698,699,846,847,700,702,703,704,705,707, 707, 708,709,710,709,712,714,715,717,717,718,719,720,595,721,722,785,723,724,725,727,728,729,730,731,732,733,734,735,737,738,739,740,741,742,836,743,743,743,743,745,848,849,746,747,748,749,837,750,751, 752,753,850,754,755,756,757,758, 759,760,761,762,855,764,766,765,767,768,769,770,771,772,773,718,774,775,776,777,778,779,783,782,781,780				
Traffic	Efficient ingress to and egress from the site has been demonstrated to be unfeasible given the current road configuration. The surrounding road network has already reached capacity, extensive queuing is experienced and road accidents at already high levels. The roads in the locality are unable to support the type and number of heavy vehicles proposed. Given the attendant costs of upgrading external and internal infrastructure, noise attenuation, pollution controls etc., the proposal is deemed uneconomic and unviable. Additionally, because rail freight termination at Enfield will still require massive truck movements to and from the site to service markets in outer Sydney, uneconomic queuing on and near the site will inevitably occur., to the frustration of transport operators, because of access difficulties. The Enfield location has passed it's "use by" date: it is no longer sufficiently far from Port Botany.	Ingress and Egress have been modelled as part of the Traffic Assessment provided in Appendix B and Chapter 7 of the EA Report. Access to the site will be redesigned to provide for heavy vehicles. The corner at Norfolk Rd and Roberts Rd will be redesigned to allow safe and appropriate access for trucks. The current and projected traffic volumes were considered during preparation of the Traffic Assessment and the road network is able to support the project increase in truck numbers on the road network. Information relating to the project justification is provided in Chapter 22 of the EA. The project as described is clearly justified in economic terms and in its ability to safeguard the local environment. Chapter 3 of the EA provides a clear justification for the site to be located within the market catchment area it will serve.		

Petitions: AIR QUALITY

IssueCategory	Comments	Response	StakeholderID	Name
Air Quality	Our quality of life would be affected by the pollution, dust and noise.	Dust and noise from the ILC site will be managed to acceptable levels and quality of life for neighbours will not be affected by the proposal.	701	**Submission 97**
Air Quality	The ill maintained diesel engines regularly emit clouds of black smelly smoke which drifts onto all adjoining houses	Emissions from diesel engines were assessed as part of the site operations assessment. The performance of diesel engines on the rail line needs to be considered by relevant government agencies as a whole. SPC is willing to participate in any Government wide consideration of this matter.	664	**Submission 177,132,175**
Air Quality	Air pollution levels will increase causing health risks	Air quality changes caused by the proposed ILC were assessed and are able to meet relevant Government guidelines. There should be no increase in health risk as a result of the proposed site.	663	**Submission 24**

Petitions: ALTERNATIVE SITES

IssueCategory	Comments	Response	StakeholderID	Name
Alternative Sites	There are other and better alternatives to and for the Enfield site.	Alternative sites are considered in Chapter 3 of the EA Report. The site at Enfield is considered to be the most suitable site to service the inner and middle western areas of the Sydney market, given the area available, its location in an industrial area and its direct connection to Port Botany by a dedicated rail freight line.	821	Submission no 317

Petitions- amenity/quality of life

IssueCategory	Comments	Response	StakeholderID	Name
amenity/quality of life	The site is in close proximity to established residential areas and intensification of use involving 24/7 road and rail use, light spill, night noise and airborne pollution will severely compromise amenity. The site is in close proximity to a number of local schools and will create health risks. Given the apparent absence of funding to develop a network of similar terminals beyond Enfield, the proposed Centre, if approved, would be subject to ever increasing demands for expansion, thus further eroding residential and environmental amenity. The proposed Intermodel Logistics Centre will affect every community along the rail freight line and road transport routes from Port Botany.	Amenity, wellbeing and quality of life are further considered in Chapter 17 of the EA Report. Noise and air pollution are considered in Chapters 11 and 12. These studies show that amenity will be unaffected during operation of the proposed development as air and noise criteria set by DEC guidelines will be met during most operations. These criteria are health based and, as long as they are met, there is no reason why there should be a greater risk to the health of school children in the area. SPC is committed to achieving noise and air quality goals during operation. Construction impacts can be managed to achieve a satisfactory level. Light spill was addressed in Chapter 16 and Appendix I of the EA and will be managed by the use of appropriate light fittings and levels. The increased traffic on the surrounding road network due to the proposal was discussed in Chapter 7 and Appendix B of the EA. It will be minimal. Traffic on the streets surrounding the ILC would be controlled through a Local Area Traffic Management Plan. Road safety will be managed through this process, and the risk of accidents for pedestrians will not change. The ILC will be capped at 300,000 TEU by virtue of the size of the site and the conditions of consent. The appropriate approach to the management of effects from the rail freight line through the area is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will be happy to work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	821	Submission 317

Petitions- amenity/quality of life

IssueCategory	Comments	Response	StakeholderID	Name
amenity/quality of life	Our quality of life would be affected by the pollution, dust and noise.	Dust and noise from the ILC site will be managed to acceptable levels and quality of life for neighbours will not be affected by the proposal	701	Submission 97
amenity/quality of life	People in this and nearby suburbs already have to contend with noise from planes- increasing the frequency of trains would have an extremely detrimental impact on our lives	The appropriate approach to the management of effects from the rail freight line through the area is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	664	Submissions 177, 132, 175

SUBMISSIONS PETITIONS CONSULTATION PROCESS

IssueCategory	Comments	Response	Stakeholder ID	Name
Consultation Process	Community consultation has also been poor.	The consultation requirements of the Department of Planning (as specified in the EA requirements) were met. Consultation with the community was undertaken during the preparation of the EA. Further consultation will be undertaken during both construction and operational phases of the project. The consultation will include the establishment of Community Liaison Groups. Details of this proposed consultation are outlined in the Statement of Commitments.	821	Submission no 317
Consultation Process	The residents of streets bordering the Port Botany Freight Line are angry at the lack of consultation by Sydney Ports regarding the impact that increased freight train movements would have on thousands of residents. Issues that need to be addressed urgently are noise and pollution. We insist on community consultation to address our issues	The consultation requirements of the Department of Planning (as specified in the EA requirements) were met. Consultation with the community was undertaken during the preparation of the EA. Further consultation will be undertaken during both construction and operational phases of the project. The consultation will include the establishment of Community Liaison Groups. Details of this proposed consultation are outlined in the Statement of Commitments. The appropriate approach to the management of effects from the rail freight line through the area is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will be happy to work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	664	Submission s 177, 132, 175

SUBMISSION PETITION JUSTIFICATION

IssueCategory	Comments	Response	Stakeholder ID	Name
justification for project	Whilst I acknowledge the economic importance of moving from road to rail freight to cater for future increases in containerised trade, I am not at all confident that this proposal has been adequately planned, nor sufficient fund allocated to a.) upgrading of infrastructure to make the proposal economically viable, b.) safeguarding the environment or c.) ameliorating the effects on local communities.	The project as described is clearly justified in economic terms and in its ability to safeguard the local environment. Further information relating to justification for the project is provided in Chapter 22 of the EA Report.	821	Submission no 317

SUBMISSIONS PETITION NOISE

IssueCategory	Comments	Response	Stakeholder ID	Name
Noise	Our quality of life would be affected by the pollution, dust and noise.	Air pollution and noise impacts are considered in Chapters 11 and 12. Noise mitigation measures have been proposed for the site which would be further developed during detailed design and during preparation of the Construction and Operation Environmental Management Plans.	701	Submission 97
Noise	We live in Railway Rd, Sydenham, which backs directly onto the freight line. We have double glazing but the noise levels are already high from night trains. We can put up with it at the present level of train movement but living here would be unbearable if the number of trains increased. Rolling stock is antiquated and ill maintained. Screaming brakes and loud banging noises are frequent in the middle of the night, waking even those residents who have double glazing installed. Unlike the airlines that have made a commitment to reducing plane noise, there has been no effort made to reduce the impact of freight train noise apart form the erection of a few ineffectual and ugly noise barriers. If trains are well maintained, noise levels could be reduced if trains travel at a slow speed. At the moment there are re no restraints at all on speed. Drivers regularly travel at high speed with correspondingly high levels of carriage and brake noise. The metal truss bridge over the Illawarra line is particularly noisy on the northern side of the tracks, with frequent loud banging noises indicating a structural or maintenance problem	The appropriate approach to the management of effects from the rail freight line through the area is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	664	Submissions 177, 132, 175
Noise	The noise currently experienced from 4 speed inhibitors in Barremma Rd and used by many young drivers as an obstacle course will increase. The residents on the first floor will experience higher noise levels	Barremma Rd will not be subject to traffic from the ILC.	663	Submission 24

SUBMISSIONS PETITION POLLUTION

IssueCategory	Comments	Response	StakeholderID	Name
pollution	Our quality of life would be affected by the pollution, dust and noise.	Dust and noise from the ILC site will be managed to acceptable levels and quality of life for neighbours will not be affected by the proposal	701	Submission No 97

SUBMISSION PETITION PROPERTY IMPACT

IssueCategory	Comments	Response	StakeholderID	Name
Property Impact	Hundreds of millions of dollars will be wiped off residential property values. This is unacceptable.	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	821	Submission no 317
Property Impact	Our properties would suffer (from the development)	Property values over Sydney as a whole have been increasing and given the limited impacts associated with the proposal there are no reasons why the proposal would affect local property prices. Further details are provided in Chapter 17.	701	Submission no 821

SUBMISSIONS PETITION RAIL ISSUES

IssueCategory	Comments	Response	StakeholderID	Name
Rail Issues	Rolling stock is antiquated and ill maintained. Screaming brakes and loud banging noises are frequent in the middle of the night, waking even those residents who have double glazing installed. Unlike the airlines that have made a commitment to reducing plane noise, there has been no effort made to reduce the impact of freight train noise apart form the erection of a few ineffectual and ugly noise barriers. If trains are well maintained, noise levels could be reduced if trains travel at a slow speed. At the moment there are re no restraints at all on speed. Drivers regularly travel at high speed with correspondingly high levels of carriage and brake noise	The appropriate approach to the management of effects from the rail freight line corridor is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	664	submission No 177

SUBMISSIONS PETITION REJECT PROPOSAL

IssueCategory	Comments	Response	Stakeholder ID	Name
Reject Proposal	We the undersigned all residents of Hankins Court, strongly oppose the proposed building of the Intermodal Logistics Centre at Enfield	Noted	701	Submission no 97
Reject Proposal	We vehemently say NO to the proposal of the Intermodal Logistics Centre- because of noise, traffic and air quality impacts	Noted	663	Submission no 24

SUBMISSION PEITION SOCIO ECONOMIC

IssueCategory	Comments	Response	Stakeholder ID	Name
Socio Economic	The overall environmental, health and social costs of the proposal are unacceptably high.	The project as described is clearly justified in economic terms and in its ability to safeguard the local environment. Further information relating to justification for the project is provided in Chapter 22 of the EA Report.	821	Submission No 317

SUBMISSIONS PETITION TRAFFIC

IssueCategory	Comments	Response	StakeholderID	Name
Traffic	Efficient ingress to and egress from the site has been demonstrated to be unfeasible given the current road configuration. The surrounding road network has already reached capacity, extensive queuing is experienced and road accidents at already high levels. The roads in the locality are unable to support the type and number of heavy vehicles proposed. Given the attendant costs of upgrading external and internal infrastructure, noise attenuation, pollution controls etc., the proposal is deemed uneconomic and unviable. Additionally, because rail freight termination at Enfield will still require massive truck movements to and from the site to service markets in outer Sydney, uneconomic queuing on and near the site will inevitably occur., to the frustration of transport operators, because of access difficulties. The Enfield location has passed it's "use by" date: it is no longer sufficiently far from Port Botany.	Ingress and Egress have been modelled as part of the Traffic Assessment provided in Appendix B and Chapter 7 of the EA Report. Access to the site will be redesigned to provide for heavy vehicles. The corner at Norfolk Rd and Roberts Rd will be redesigned to allow safe and appropriate access for trucks. The current and projected traffic volumes were considered during preparation of the Traffic Assessment and the road network is able to support the projected increase in truck numbers on the road network. Information relating to the project justification is provided in Chapter 22 of the EA. The project as described is clearly justified in economic terms and in its ability to safeguard the local environment. Chapter 3 of the EA provides a clear justification for the site to be located within the market catchment area it will serve.	821	Submission no 317
Traffic	Traffic would be horrendous as the result of this project if allowed to be built.	Traffic increases on the surrounding road network resulting from the proposal would be less than 1%.	701	Submission 97
Traffic	Though Barremma Rd has signage limiting trucks to 3t Tonnes, this is constantly breached by large trucks. Barremma Rd already carries excessive traffic from Yangoora Rd as we are the first street that allows passage after Juno Pde, Punchbowl Rd up Yerrick Rd. (A natural progression after the traffic lights on the corner of Punchbowl and Yerrick Rd. We also carry the reverse traffic from Lakemba St. Barremma Rd is bounded by Yangoora Rd and Lakemba St: our building is very, very close to Yangoora Rd. With the proposed Intermodal Logistics Centre- Enfield, more car traffic will continue along Barremma Rd and with traffic hold ups that will inevitably occur with these large trucks entering exiting we will experience intermittent large flows of vehicular traffic that have built up waiting for clearance to proceed.	Barremma Rd will not be subject to traffic generated by the ILC, nor is there any reason why other traffic would divert to Barremma Rd from other streets due to traffic from the ILC.	663	Submission 24

Appendix F Noise Technical Memorandum

RENZO TONIN & ASSOCIATES
Consultants in Acoustics, Vibration and Structural Dynamics
Email: acoustics@rtagroup.com.au Website: www.rtagroup.com.au

technical memo

Reference: TB867-04F03 (REV 8) ADDITIONAL INFO & NOISE MITIGATION OPTIONS

Date: 5 April 2006

To: SKM

ATTN: Kenneth Robinson Email: KRobinson@skm.com.au

FROM: Peter Karantonis DIRECT LINE: 8218 0503

RE: ENFIELD ILC – ADDITIONAL INFORMATION AND NOISE MITIGATION OPTIONS TO BE CONSIDERED DURING DETAIL DESIGN & EMP PHASE

This Technical Memo, in particular, deals with the issues raised in submissions by DEC and NSW Health, which require the provision of additional information to address the identified issues. The key issues addressed herein include:

1. how conservative the noise modeling is that was presented in the Noise Impact Assessment (NIA) compared to the noise modeling results of likely/typical operational scenarios during day, evening and night under calm and a range of worst-case wind conditions,

2. confirmation of SPC's commitment to achieve the Project Specific Noise Levels (PSNLs) through the provision of additional physical and management noise mitigation measures to be considered during the Detailed Design (DD) and Environmental Management Plan (EMP) phase, where more detailed noise modeling would be undertaken,

3. provision of a more detailed analysis and additional information with respect to noise impacts potentially causing sleep arousal,

4. provision of wind data used in the noise assessment, and

5. provision of a more detailed analysis and additional information with respect to traffic noise impacts.

Date	Revision History	Non-Issued Revision	Issued Revision	Reviewers Initials
16/03/06	Revised Draft	-	1	PK
17/03/06	Revised Draft	-	2	PK
21/03/06	Revised Draft	3	5	PK
3/04/06	Revised Draft	4	6	PK
5/04/06	Final	7	8	PK

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This document is prepared for our client's particular requirements and/or for submission to a regulatory authority. It is not intended for and should not be relied upon by a third party and no responsibility is undertaken to any third party. The information contained herein is for the purpose of acoustics only. No claims are made and no liability is accepted in respect of design and construction issues falling outside of the specialist field of acoustics engineering including and not limited to structural integrity, fire rating, architectural buildability and fit-for-purpose, waterproofing and the like. Supplementary professional advice should be sought in respect of these issues.

20 YEARS
1982-2002 ACOUSTIC ENGINEERING EXCELLENCE

AAAC Member of the Association of Australian Acoustical Consultants

Sydney (Head Office)
Renzo Tonin & Associates (NSW) Pty Ltd
ABN 29 117 462 861
1/418A Elizabeth St., SURRY HILLS
NSW 2010
PO Box 877 STRAWBERRY HILLS
NSW 2012
Ph (02) 8218 0500 Fax (02) 8218 0501

Melbourne
Renzo Tonin & Associates (Vic) Pty Ltd
ABN 30 117 463 297
1/66 Curzon St., NORTH MELBOURNE
VIC 3051
Ph (03) 9329 5414 Fax (03) 9329 5627

1. CONSERVATIVE NOISE MODELLING & ASSESSMENT

As an operator has not yet been appointed for the site, the design and operation of the site is fluid in many ways, leaving several uncertainties pertaining to the final site layout/ design, construction of buildings and general operations on site.

Given the above, and consistent with our instructions from SPC to undertake noise modeling for the "worst-case" scenario so as not to unnecessarily prescribe the operation of the site at this stage, a "worst case" noise model was built and a conservative assessment was undertaken in accordance with all relevant noise policies and guidelines.

Whilst DEC's comments acknowledge that the NIA conservatively assesses a "worst-case" operational scenario, especially with regards to the INP's 'Amenity' noise criteria (which are more stringent than the 'Intrusiveness' criteria for this project), the need to present a likely or typical operational scenario is identified in order to demonstrate that noise impacts can be curtailed and managed if necessary.

Before considering any additional noise mitigation measures to those already included in the NIA, it is important to identify the key areas where the NIA model can be viewed as being conservative. Table 1 below presents the key areas of conservatism which are built into the assumptions used in the NIA noise model for assessing impacts at night, and what effect each of these would have if one were to model a likely or typical night operational scenario.

Table 1 – Conservatism in the NIA's Night-time Noise Assessment

Item Description	Differences between NIA's 'Worst-Case' Noise Assessment and a 'Typical' Night Noise Assessment
1. Operations at Night the Same as for Day The modelled "worst-case" scenario is assessed as if it would occur 24 hours per day, 7 days per week. Although this is possible in situations where the ILC might operate at its maximum capacity at night, it is likely that night-time activities on site would be a fraction of the peak daytime activities as can be derived from the operational daily profile information available at this stage – see "Daily Truck Movement Profile" graph presented in Section 3.2 of this Technical Memo.	According to the information presented in Annexure 1, the night-time assessment presented in the NIA would be 2dB(A) higher for a 15 minute 'intrusiveness' criteria assessment and 7dB(A) higher for a 9hr 'amenity' criteria assessment, than for a typical night scenario with respect to noise contributions from mobile plant (forklifts, gantry cranes, reach stackers and trucks). SPC advises that for a typical night scenario, each train would take approx. 2hrs to load/unload and up to 2 trains would be handled in one night. So locomotive noise can be assumed to occur for approx. 40% of a 9-10hr night period. Therefore, the night-time assessment presented in the NIA would be 4dB(A) higher than for a typical night scenario with respect to noise contributions from locomotives.
2. Activities at Capacity throughout the Entire Assessment Period The NIA conservatively assumes that the "worst-case" scenario operations will occur for an entire 9-10 hour night-time duration, where night is 10pm-7am on Mon-Sat and 10pm-8am on Sundays and Public Holidays, as is the case when assessing to the INP's Amenity Criteria. The modelled "worst-case" scenario may occur for short periods in the night, but from what can be derived from the operational information available at this stage, this is unlikely to occur for the entire 9-10 hour night period.	
3. Wind Blows in the Same Direction throughout the Entire Assessment Period Noise exceedances presented in Table 4.11 on p.35 of the NIA (or Table 11.7 on p.11-12 of the EA), are for when adverse winds blow in a direction that enhance noise to neighbouring residences and	Based on a detailed analysis conducted on the hourly wind data from the Lidcombe AWS for the entire year of 1999 (a copy can be provided on request), noise-enhancing winds to any

Item Description	Differences between NIA's 'Worst-Case' Noise Assessment and a 'Typical' Night Noise Assessment
most of the exceedances are found when assessing site noise to the INP's Amenity Criteria. It is assumed in the NIA that such noise enhancing winds blow with strengths of less than 3m/s and in the same direction for the entire 9-10 hour night period. Based on the review of hourly wind data recently provided to us by SKM, this is not likely to occur frequently.	one receiver are not likely to remain steady in any single direction for more than 69% of an entire night-time assessment period. This proportion of time in one night that noise-enhancing (adverse) wind could blow in any single direction, equates to 1.6dB(A). That is, the NIA night-time predictions would be 1.6dB(A) higher than for a typical night scenario with respect to this aspect alone.
4. Wind Blows at a Constant Maximum Speed throughout the Assessment Period Where adverse (or noise enhancing) wind conditions are identified to occur for more than 30% of the time, making wind a feature of the area, an assessment under these conditions is required. The noise model has conservatively used the maximum noise-enhancing wind of 3m/s occurring for the entire 9-10 hour night period. From the hourly wind data available it can be seen that wind strengths will vary up and down from 0m/s to 3m/s throughout the night, therefore the wind's level of noise enhancement is not likely to be as prominent as that modelled for the NIA.	Given that noise-enhancing winds to any one receiver are not likely to remain at a steady 3m/s speed throughout an entire night, but are shown to fluctuate between 0 and 3m/s throughout the night, then the night-time assessment presented in the NIA would be significantly higher than what is likely to occur. For example, depending on the location, the NIA noise model would be up to 6-7dB(A) higher than with a 1.5m/s wind speed (the highest mean and median wind speed from all four seasons analysed from the Lidcombe hourly wind data), and up to 4-5dB(A) higher than with a 2m/s wind speed, representing the average wind speed over a typical night.
5. No Acoustic Shielding from Containers on Site Local shielding benefits provided by container stacks on site are not included in the NIA noise model. Containers, which can be stacked 5-6 high (2.4m each x 5 containers = 12m high), especially in the two storage areas located in the NW and SW corners of the site, can provide 5-10dB(A) noise shielding during times when mobile plant operates behind a stack and 0dB(A) noise shielding when operating without stacking.	Based on an assumption that for 50% of the time in an assessment period, mobile plant is likely to be working in positions shielded by containers stacked on site and for the remaining 50% of the period mobile plant will not be shielded by containers, the night-time assessment presented in the NIA would be 3dB(A) higher than for a typical night scenario with respect to noise contributions from mobile plant (forklifts, gantry cranes, reach stackers and trucks).
6. Non-Industrial Small Buildings Off-Site not Modelled All non-industrial (ie residential and small commercial buildings) off-site have not been included in the noise model, so acoustic shielding benefits provided by such buildings located between the site and noise receiver locations are not accounted for.	For the worst-affected (first-row) of dwellings impacted upon by site noise, the NIA is not conservative and therefore is suitable for a typical night scenario assessment. However, for rows of dwellings located beyond the first row, the noise assessment presented in the NIA would be 5-10dB(A) higher than if the model included all of the off-site small buildings.

Table 1 above shows how the noise impacts presented in the NIA are conservative and how they can be significantly reduced should the most realistic operational scenario be modelled. These types of adjustments to noise modelling can be incorporated in the detailed noise model once the operators of the site have been appointed and at the Detailed Design and Environmental Management Plan phase to accurately establish the likely operational noise levels from the ILC site.

In the interim however, the most likely or typical operational scenario has been modelled from all available information known at this stage of the project. To model the typical operational scenario the following assumptions were included in the noise model:

- the earth mound of 2-5m described in the EA as running along the eastern side of the site, is modelled at a 5m height in most areas including the gaps between Buildings A, B, C, D and E, down to a 2m height when immediately behind Buildings A, B, C, D and E, with a 2m solid fence along the top of the earth mound – the NIA noise model did not include a 2m fence on top of the earth mound and was not at a constant 5m height in all critical sections along the boundary as has been modelled herein,
- a row of containers stacked 3 high (3 x 2.4m = 7.2m) along the western side of the 'Toll Lease' area,
- a row of containers stacked 3 high (3 x 2.4m = 7.2m) along the southern side of the Empty Container Storage (ECS) area,
- placement of fixed mechanical services plant behind buildings, screens and/or in plantrooms, so to not contribute to the overall noise emissions from the site,
- site operation corrections for the number and duration of activities expected to occur during the day, evening and night periods to permit assessment of impacts in terms of the 'intrusiveness' and 'amenity' criteria for each period – see Annexure 1,
- wind direction corrections for the proportion of time that noise-enhancing winds blow to any one receiver over the entire 'amenity' assessment periods: less than 43% during the 10-11 hour day period, 53% during the 4 hour evening period and 69% during the 9-10 hour night period (based on an analysis of hourly wind data from Lidcombe AWS for the entire year of 1999 provided to us by SKM – a copy of this data can be provided if required), and
- wind speed corrections for the noise-enhancing winds blowing from the site to any one receiver over an entire assessment period - the noise model was corrected to have a wind speed of 1.5m/s at night and 2m/s in the day and evening (being the highest mean and median wind speeds per period from all four seasons analysed from the Lidcombe hourly wind data referred to above), representing the wind speeds over most of a typical day/evening/night 'amenity' assessment period, and a 2.5m/s wind speed assumed for most of the time during the day/evening/night 'intrusiveness' periods.

The NIA presented the worst-case operational scenarios and assessed these against the most noise-sensitive period being the Night period. As the typical operational scenario is different for each of the three assessment periods (Day, Evening and Night), the results of noise modelling presented here in Tables 2, 3 and 4 are for the Day, Evening and Night periods, respectively. For each of the three assessment periods, noise was modelled for calm conditions and for the worst-case wind conditions based on a more detailed wind-vector analysis conducted of all available wind-rose data for each of the three assessment periods (3 directions selected for modelling during Day and Evening periods and 4 directions during the most critical Night period). Separate noise models for the 'intrusiveness' and the 'amenity' assessment periods, were run to allow for the direct assessment of impacts for each scenario during each of the three assessment periods.

Table 2 – 'Daytime' Operational Scenario With Mitigation Measures, dB(A)

Location		'Intrusive' Noise Levels, $L_{Aeq(15min)}$									'Amenity' Noise Levels, $L_{Aeq(night)}$								
			Calm		Wind - W		Wind - SW		Wind - NW			Calm		Wind - W		Wind - SW		Wind - NW	
		Criteria	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	*Criteria*	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?
A1	Eastern end of Jean St	*54*	43	Yes	39	Yes	45	Yes	37	Yes	*54*	42	Yes	38	Yes	39	Yes	36	Yes
A2	Eastern end of Ivy St	*53*	41	Yes	36	Yes	36	Yes	38	Yes	*52*	40	Yes	35	Yes	35	Yes	31	Yes
A3	2 Wentworth St (south)	*49*	35	Yes	39	Yes	30	Yes	44	Yes	*52*	34	Yes	38	Yes	29	Yes	38	Yes
A4	Eastern end of Gregory St	*49*	35	Yes	47	Yes	47	Yes	43	Yes	*52*	34	Yes	42	Yes	41	Yes	42	Yes
A5	Western end of Blanche St	*46*	39	Yes	43	Yes	39	Yes	**47**	**No by 1**	*58*	38	Yes	44	Yes	38	Yes	41	Yes
A6	40 Bazentin St	*46*	37	Yes	43	Yes	36	Yes	**47**	**No by 1**	*58*	36	Yes	46	Yes	35	Yes	42	Yes
A11	Begnell Park	-	-	-	-	-	-	-	-	-	*50*	41	Yes	39	Yes	42	Yes	42	Yes
A12	Matthew Park	-	-	-	-	-	-	-	-	-	*50*	35	Yes	30	Yes	29	Yes	29	Yes
A13	Greenacre Bowling Club	-	-	-	-	-	-	-	-	-	*55*	27	Yes	23	Yes	20	Yes	27	Yes
A14	Strathfield South High School	-	-	-	-	-	-	-	-	-	*50*	36	Yes	38	Yes	41	Yes	31	Yes
A15	St Anne's School	-	-	-	-	-	-	-	-	-	*50*	35	Yes	42	Yes	43	Yes	43	Yes

*Note: 1. **Bold** font indicates exceedance with NSW EPA Industrial Noise Criteria*

2. Equivalent to internal criteria of 40dB(A), as per Table 2.1 and Note 10 of the NSW INP, which is more stringent than the 'school playground' criterion of 55dB(A) as per Table 2.1 of the NSW INP .

Table 3 – 'Evening' Operational Scenario With Mitigation Measures, dB(A)

Location		'Intrusive' Noise Levels, $L_{Aeq(15min)}$									'Amenity' Noise Levels, $L_{Aeq(night)}$								
			Calm		Wind - W		Wind - NW		Wind - N			Calm		Wind - W		Wind - NW		Wind - N	
		Criteria	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	*Criteria*	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?
A1	Eastern end of Jean St	*54*	40	Yes	36	Yes	34	Yes	35	Yes	*49*	39	Yes	35	Yes	33	Yes	34	Yes
A2	Eastern end of Ivy St	*52*	39	Yes	34	Yes	36	Yes	41	Yes	*51*	39	Yes	33	Yes	36	Yes	35	Yes
A3	2 Wentworth St (south)	*47*	32	Yes	37	Yes	42	Yes	43	Yes	*53*	32	Yes	36	Yes	36	Yes	38	Yes
A4	Eastern end of Gregory St	*47*	33	Yes	44	Yes	41	Yes	30	Yes	*46*	32	Yes	38	Yes	40	Yes	29	Yes
A5	Western end of Blanche St	*46*	36	Yes	42	Yes	44	Yes	45	Yes	*50*	35	Yes	34	Yes	38	Yes	44	Yes
A6	40 Bazentin St	*45*	34	Yes	41	Yes	45	Yes	45	Yes	*54*	33	Yes	37	Yes	41	Yes	46	Yes

*Note: 1. **Bold** font indicates exceedance with NSW EPA Industrial Noise Criteria*

Table 4a – 'Night' Operational Scenario With Mitigation Measures – INP 'Intrusiveness' Assessment, dB(A)

Location		'Intrusive' Noise Levels, $L_{Aeq(15min)}$										
			Calm		Wind - W		Wind - NW		Wind - SW		Wind - SE	
		Criteria	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?
A1	Eastern end of Jean St	*48*	41	Yes	37	Yes	35	Yes	45	Yes	**50**	**No by 2**
A2	Eastern end of Ivy St	*47*	40	Yes	34	Yes	37	Yes	35	Yes	47	Yes
A3	2 Wentworth St (south)	*42*	33	Yes	37	Yes	42	Yes	28	Yes	28	Yes
A4	Eastern end of Gregory St	*45*	34	Yes	45	Yes	42	Yes	45	Yes	34	Yes
A5	Western end of Blanche St	*43*	37	Yes	39	Yes	42	Yes	37	Yes	32	Yes
A6	40 Bazentin St	*41*	35	Yes	41	Yes	**45**	**No by 4**	34	Yes	29	Yes

*Note: 1. **Bold** font indicates exceedance with NSW EPA Industrial Noise Criteria*

Table 4b – 'Night' Operational Scenario With Mitigation Measures – INP 'Amenity' Assessment, dB(A)

Location		'Amenity' Noise Levels, $L_{Aeq(15min)}$										
			Calm		Wind - W		Wind - NW		Wind - SW		Wind - SE	
		Criteria	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?	Noise Level	Comply (Y/N)?
A1	Eastern end of Jean St	*42*	36	Yes	32	Yes	30	Yes	40	Yes	42	Yes
A2	Eastern end of Ivy St	*45*	35	Yes	30	Yes	32	Yes	30	Yes	39	Yes
A3	2 Wentworth St (south)	*38*	28	Yes	33	Yes	34	Yes	24	Yes	23	Yes
A4	Eastern end of Gregory St	*37*	29	Yes	37	Yes	37	Yes	37	Yes	30	Yes
A5	Western end of Blanche St	*43*	32	Yes	30	Yes	34	Yes	32	Yes	27	Yes
A6	40 Bazentin St	*39*	30	Yes	33	Yes	37	Yes	29	Yes	24	Yes

*Note: 1. **Bold** font indicates exceedance with NSW EPA Industrial Noise Criteria*

Tables 2, 3, 4a and 4b above show how noise emissions from the site during typical operations, with the NIA noise mitigation measures applied and the assumptions and measures noted above, will comply with both the 'Intrusiveness' and the 'Amenity' noise criteria under calm conditions and worst-case noise-enhancing wind conditions, at all receivers with the exception of the following slight exceedances:

- Daytime (Intrusiveness): Locations A5 & A6 under a NW wind condition by 1dB(A)
- Night-time (Intrusiveness): Location A1 under a SE wind condition by 2dB(A)
- Night-time (Intrusiveness): Location A6 under a NW wind condition by 4dB(A)

As shown above, and consistent with the NIA, the greatest impacts are expected to occur during the night-time period of 10pm to 7am/8am. An analysis of the daily background noise level profiles shows that during the 'morning shoulder period' of 6am to 7am, which technically falls within the night period but according to the INP can be assessed separately as the 'morning shoulder period', background noise levels tend to increase by 5-10dB(A) compared to 2-4am when background noise levels are lowest and subsequently influence the night 'intrusiveness' noise criteria. Given that most of the ILC site maximum noise events at night are likely to occur during the hour commencing at 6am (see Table 5 in Section 3 below), then impacts during this end of night-time period ('morning shoulder period') would be significantly less than indicated above.

Furthermore, the modelled typical operational scenarios presented in Tables 2, 3, 4a and 4b above do not include additional noise mitigation measures, such as those discussed in Section 2 below. Therefore, there is scope to further reduce noise emission levels from the operation of the site as part of the DD / EMP phase in order to comply with the Project Specific Noise Levels.

Notwithstanding he above, a 1-2dB(A) noise exceedance is generally considered marginal and inconsequential, and a 4dB(A) exceedance is generally considered of minor significance. Such noise exceedances are manageable through the process of preparing and implementing an effective Environmental Management Plan for the operation of the site.

2. NOISE MITIGATION OPTIONS TO BE CONSIDERED DURING DETAIL DESIGN & EMP PHASE

It is considered that all practical (reasonable/ feasible) noise mitigation options were considered at the NIA stage to reduce noise level emissions from site. These included residential grade mufflers (capable of providing a 6dB reduction to plant) and the construction of two noise walls, one to the north west, the other to the south east. At the EA/ concept stage it was known that these measures could be incorporated onto the site, and it was therefore possible for SPC to commit to them.

Due to the number of uncertainties about the site layout/ design, construction of buildings and general operations on site, it was deemed impractical to consider further mitigation at this stage. It will however be necessary to consider all possible mitigation options during the Detailed Design (DD) and Environmental Management Plan (EMP) phase where more detailed noise modeling would be undertaken, once the operators have been appointed to the site and specific operational details are better known.

The noise mitigation options which would be considered further during the DD and EMP phase and evaluated in terms of their reasonableness and feasibleness include:

A. Physical Mitigation Measures

1. optimise the detailed design of noise barriers, earth mounds and fencing in terms of their location, heights and lengths
2. the use of quieter plant and equipment (where available)
3. the strategic placement and/or acoustic treatment of fixed plant and the replacement of PA systems with alternative means of communications on site to avoid noise contributions from such items
4. the strategic placement of container stacks on site to provide shielding to nearest residential receptors
5. the strategic placement of buildings on site to provide shielding to nearest residential receptors
6. the construction of acoustic screens, sheds or canopies (partial enclosures) over noise generating areas
7. work with the rail industry to minimize locomotive impacts within the context of the Rail Working Group for Port Botany Expansion

B. Management Measures

8. training and educational programs for employees on how to minimise unnecessary noise at night (eg quiet methods for handling and moving containers etc)
9. minimise certain operations at night (ie capacity / operational hours) where such actions would not affect the feasibility of the site's operation
10. management of operations to minimise unnecessary locomotive presence / idling / movements
11. monitor noise levels on site to determine actual noise levels compared to PSNLs and to address specific issues
12. incorporate all reasonable and feasible physical and management measures into the final EMP for the operation of the site

At this stage SPC commits to achieving the Project Specific Noise Levels (PSNLs) established in the EA when the site is operational through the implementation of more specific noise mitigation and management measures, to be determined at the DD and EMP phase.

3. SLEEP AROUSAL – ADDITIONAL DETAILED ANALYSIS

It is reiterated that peak noise level events such as noise from dropping heavy items or other high noise level events have the potential to cause sleep disturbance. The NSW Industrial Noise Policy (INP) does not specifically address sleep disturbance from high noise level events.

The potential for high noise level events at night and effects on sleep are addressed in the NIA, however in response to the additional information requested by DEC in their submission the following additional assessment is provided.

The result of DEC's review of current research on sleep disturbance is presented in the NSW "Environmental Criteria for Road Traffic Noise" (ECRTN) that was published in 1999. At this time it was concluded that the range of results is sufficiently diverse and that it is not reasonable to issue new noise criteria.

From the available research, DEC recognises that current sleep disturbance criteria of $L_{A1,(1min)}$ less than $L_{A90,(15min)}$ plus 15 dB(A) is not ideal. Nevertheless as there is insufficient evidence to conclude what should replace it, DEC continue to use it as a guide that identifies the likelihood of sleep disturbance.

Sleep disturbance is assessed as the emergence of the $L_{A1(1min)}$ level above the $L_{A90(15min)}$ level at the time. Appropriate screening criteria for sleep disturbance are determined to be an $L_{A1(1min)}$ level 15dB(A) above the Rating Background Level (RBL) in each area for the night-time period.

It is noted that the $L_{A1(1min)}$ descriptor is meant to represent a maximum noise level measured under "fast" time response and normally an analysis based on either $L_{A1(1\ min)}$ or $L_{A(max)}$, is acceptable.

The NIA, in assessing the worst-case operational scenarios, had identified Locations A1 and A5 during calm-isothermal conditions and Locations A1, A4, A5 and A6 during adverse wind conditions, where the screening criterion for sleep disturbance is exceeded.

To provide a more detailed analysis of the noise exceedances, the following are addressed herein:

- present the extent that the maximum noise level exceeds the background level,
- estimate the number of times or how often high noise events will occur at night,
- time of day sleep disturbance is likely to occur - sleep disturbance is normally taken to occur between 10pm and 7am as is for this assessment,
- evaluate whether there are times of day when there is a clear change in the noise environment (ie such as during early morning shoulder periods), and
- comparison of existing maximum noise levels to those predicted to occur in future from the operation of the site.

3.1 EXTENT THAT MAXIMUM NOISE LEVEL EMISSIONS EXCEED NIGHT BACKGROUND NOISE LEVELS

The results from Table 4.9 from the NIA are repeated below in Table 5, with some additional results from modeling in two extra wind directions, showing the extent that the predicted ILC maximum noise emissions exceed the monitored night-time background noise levels (RBLs) presented in Table 3.2 of the NIA.

Table 5 – Assessment of Predicted ILC Site Maximum Noise Emissions Compared to Night Background Noise Levels

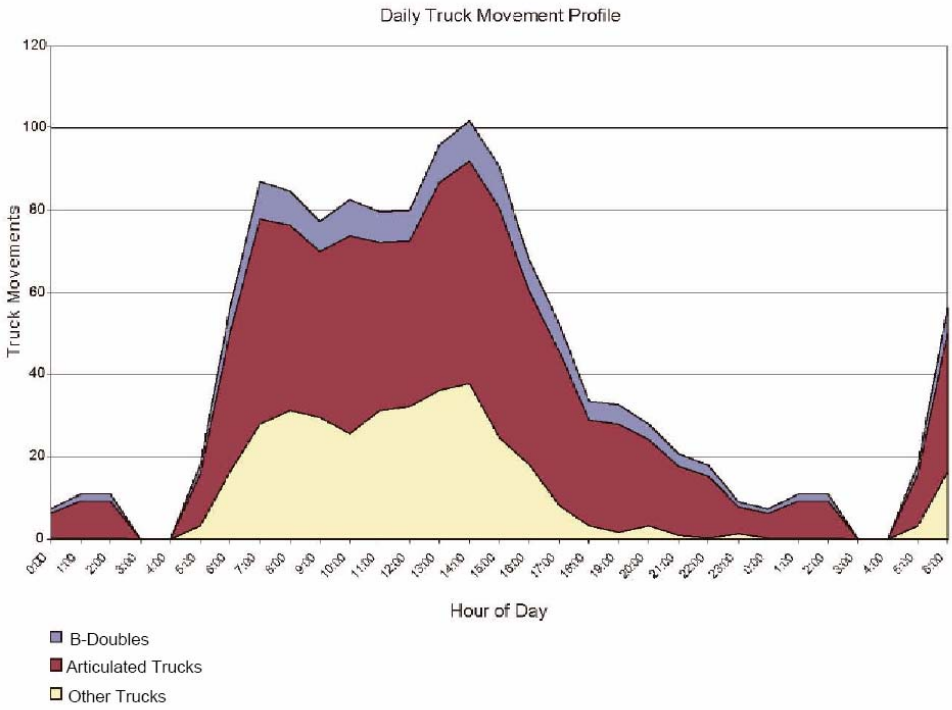
Location		Night-time L_{A90} Background Noise Levels (RBL), dB(A)	Predicted ILC Maximum Noise Levels, dB(A)									
			Calm & isothermal		Wind - W		Wind - NW		Wind - SW		Wind - SE	
			Level	Exceeds RBL	Level	Exceeds RBL	Level	Exceeds RBL	Level	Exceeds RBL	Level	Exceeds RBL
A1	Eastern end of Jean St	43	60	**17**	56	13	54	11	64	**21**	69	**26**
A2	Eastern end of Ivy St	42	42	-	36	-	39	-	37	-	51	9
A3	2 Wentworth St (south)	37	39	2	43	6	50	13	34	-	33	-
A4	Eastern end of Gregory St	40	50	10	65	**25**	60	**20**	65	**25**	51	11
A5	Western end of Blanche St	38	61	**23**	68	**30**	71	**33**	62	**24**	56	**18**
A6	40 Bazentin St	36	51	15	61	**25**	65	**29**	51	15	45	9

Note: **Bold** indicates areas where exceedances occur to the screening sleep arousal criteria

3.2 NUMBER OF ILC MAXIMUM NOISE EVENTS PER NIGHT

Although this level of detail cannot be provided accurately at this early stage of the project, without having appointed operators for the site, estimates of the likely number of maximum noise events are presented below based on the nightly hourly profile of container movements.

According to SPC, the profile diagram of container movements will tend to follow the profile of on site container truck activity, as presented in Figure 7-4 and Table 7-4 of the EA – see figure below.



That is, based on 300,000 TEU throughput per annum = 1,000 TEU throughput per week day (equivalent to 630 containers), and assuming at least one train (80 TEU capacity train equating to 40 containers) to be unloaded in between 10pm-5am, the following hourly profile at night is assumed. Furthermore, it is assumed that there will be approximately 2 'bangs' per container movement (eg. train to storage area or storage area to transport vehicle).

Table 6 – Estimated No. of ILC Maximum Noise Events per Hour at Night

Hour Commencing	10pm	11pm	12am	1am	2am	3am	4am	5am	6am
Truck container truck movements	18	8	7	11	11	0	0	15	41
% of total container trucks in a 24hr period	2%	1%	1%	1%	1%	0%	0%	2%	5%
No. of container movements	30	13	12	18	18	0	0	25	68
No. of hourly 'bangs'	80	46	24	36	36	0	0	50	136

Note: as an example train assumed to unload between 10pm and midnight

The figure above taken from the EA and Table 6 above, both show clearly that most of the truck and container movements and subsequently likely maximum noise events from the ILC site, are expected to occur during the day period with some occurring during the evening period and only a very few at night (13% of total). The time of the night when most of the maximum noise events are likely to occur is shown in the table above to be at the start and end of the night-time period, which tend to have higher background noise levels than in the middle of the night-period, resulting in less sleep disturbance impacts.

Furthermore, the likely number of maximum noise events are determined and presented as a range for each hour at night.

Importantly, during the time of the night (around 3am and 4am) when background noise levels are at their lowest and sleep disturbance risks are greatest, maximum noise events would likely be low.

3.3 TIME OF DAY OF SLEEP DISTURBANCE & TIMES OF DAY WHEN THERE IS A CLEAR CHANGE IN THE NOISE ENVIRONMENT

A further analysis of the daily noise monitoring graphs presented in Appendix C of the NIA was conducted. From this, it was found that during the early morning shoulder period of 6am to 7am, which technically falls within the night period but according to the INP can be assessed separately as the 'morning shoulder period', background noise levels tend to increase by 5-10dB(A) compared to 2-4am when background noise levels are lowest.

Given that background noise levels during the quietest time of the night, being 2-4am, tend to influence the RBLs the most, and subsequently set the sleep disturbance criteria, then the screening sleep arousal criteria at assessment locations would also increase and become less stringent by 5-10dB(A) for the 'morning shoulder period'. Furthermore, given that most of the ILC site maximum noise events at night are likely to occur during the hour commencing at 6am (see Table 6 above), then sleep disturbance impacts throughout the night-time period would be significantly less than predicted in Table 5 above and in the NIA.

3.4 COMPARISON OF EXISTING MAXIMUM NOISE LEVELS TO PREDICTED ILC MAXIMUM NOISE LEVELS

Monitoring of existing night-time maximum noise levels was undertaken as part of the NIA. To compare the magnitude of maximum noise events modeled from the operation of the site to the

magnitude of typical maximum noise levels that currently occur in the existing noise environment, a more detailed analysis was undertaken of the available noise data acquired from noise monitoring conducted in February-March 2005 at representative locations surrounding the site.

Below the L_{max} noise levels presented are those monitored at the six monitoring locations selected as best representing the assessment locations relevant to site operational noise.

The tables below present for each monitoring location the typical range of maximum noise levels (L_{max} Range) and the typical range of differences measured between the maximum and the equivalent-continuous noise levels ($L_{max} – L_{eq}$ Range). The L_{max} noise levels reported below are those that occur at night, and for L_{max} noise levels greater than 65dB(A) where $L_{max} – L_{eq} \geq$ 15dB(A).

Table 7 – Location M1: 6 Jean St, Strathfield South

Date	Lmax Range		Lmax-Leq Range	
	MIN	MAX	MIN	MAX
Wednesday-16-February-2005	68	80	17	25
Thursday-17-February-2005	67	72	16	22
Friday-18-February-2005	65	74	15	22
Saturday-19-February-2005	65	65	17	17
Sunday-20-February-2005	66	70	15	20
Monday-21-February-2005	71	84	18	31
Tuesday-22-February-2005	65	71	15	20
Wednesday-23-February-2005	68	71	16	19
Thursday-24-February-2005	67	78	15	21
Averages	**67**	**74**	**16**	**22**

Table 8 – Location M2: 42 Norfolk Rd, Strathfield South

Date	Lmax Range		Lmax-Leq Range	
	MIN	MAX	MIN	MAX
Tuesday-15-February-2005	68	85	17	28
Wednesday-16-February-2005	74	83	20	28
Thursday-17-February-2005	74	83	19	28
Friday-18-February-2005	72	87	18	32
Saturday-19-February-2005	74	84	22	30
Sunday-20-February-2005	71	78	17	24
Monday-21-February-2005	72	80	20	25
Tuesday-22-February-2005	72	82	20	26
Wednesday-23-February-2005	71	83	18	26
Averages	**72**	**83**	**19**	**27**

Table 9 – Location M3: 14 Wentworth St (south), Greenacre

Date	Lmax Range		Lmax-Leq Range	
	MIN	MAX	MIN	MAX
Wednesday-16-February-2005	67	76	19	30
Thursday-17-February-2005	66	84	17	36
Friday-18-February-2005	66	82	17	33
Saturday-19-February-2005	65	66	18	24
Sunday-20-February-2005	82	83	17	38
Monday-21-February-2005	66	97	16	35
Tuesday-22-February-2005	68	79	19	35
Wednesday-23-February-2005	65	79	18	30
Thursday-24-February-2005	67	84	15	31
Averages	**68**	**81**	**17**	**32**

Table 10 – Location M4: 124B Dean Street, Strathfield South

Date	Lmax Range		Lmax-Leq Range	
	MIN	MAX	MIN	MAX
Thursday-16-February-1905	66	72	15	26
Friday-17-February-1905	65	69	16	25
Saturday-18-February-1905	66	73	16	27
Sunday-19-February-1905	71	76	17	20
Monday-20-February-1905	67	71	16	21
Tuesday-21-February-1905	66	70	15	24
Wednesday-22-February-1905	66	75	15	25
Thursday-23-February-1905	65	73	16	20
Friday-24-February-1905	67	72	15	26
Averages	**67**	**72**	**16**	**24**

Table 11 – Location M5: 43 Blanche Street, Strathfield South

Date	Lmax Range		Lmax-Leq Range	
	MIN	MAX	MIN	MAX
Wednesday-16-February-2005	66	80	19	28
Thursday-17-February-2005	65	71	16	28
Friday-18-February-2005	65	70	19	25
Saturday-19-February-2005	66	66	15	23
Sunday-20-February-2005	67	73	15	30
Monday-21-February-2005	66	71	15	27
Tuesday-22-February-2005	71	73	17	27
Wednesday-23-February-2005	73	73	15	22
Thursday-24-February-2005	66	75	16	26
Averages	**67**	**72**	**16**	**26**

Table 12 – Location M6: 40 Bazentin Street, Belfield

Date	Lmax Range		Lmax-Leq Range	
	MIN	MAX	MIN	MAX
Wednesday-16-February-2005	65	77	17	32
Thursday-17-February-2005	66	79	19	28
Friday-18-February-2005	70	81	17	28
Saturday-19-February-2005	67	69	19	24
Sunday-20-February-2005	-	-	17	20
Monday-21-February-2005	66	76	17	24
Tuesday-22-February-2005	67	78	19	26
Wednesday-23-February-2005	65	79	20	28
Thursday-24-February-2005	66	79	18	26
Averages	**67**	**77**	**18**	**26**

The above tables show that maximum noise levels forming part of the existing acoustic environment are currently high and well above the L_{A90} background noise plus 15dB(A) screening criterion and also above 65dB(A), which is considered to be the external noise level that could cause sleep arousal based on recent research (see Section 4.1.2 of the NIA). Furthermore, the above tables show that the measured maximum noise levels are generally greater than the emergence criterion of $L_{max} - L_{eq} \geq 15dB(A)$.

Table 13 below compares typical existing maximum noise levels monitored at the noise monitoring locations against the modeled maximum noise levels expected to occur at assessment locations in close proximity to the monitoring locations.

Table 13 – Comparison of Existing Maximum Noise Levels to Predicted ILC Site Maximum Noise Level Emissions

Location		Measured Existing Maximum Noise Levels, (Average) dB(A)		Maximum Noise Levels from ILC Site Operations (Worst-Case Prediction from NIA) dB(A)					Are NIA Maximum Noise Levels Lower than the Existing Maximum Noise Levels? (Yes/No)
		MIN	MAX	Calm & isothermal	Wind - W	Wind - NW	Wind - SW	Wind - SE	
A1	Eastern end of Jean St	67	74	60	56	54	64	69	Yes
A2	Eastern end of Ivy St	72	83	42	36	39	37	51	Yes
A3	2 Wentworth St (south)	68	81	39	43	50	34	33	Yes
A4	Eastern end of Gregory St	67	72	50	65	60	65	51	Yes
A5	Western end of Blanche St	67	72	61	68	71	62	56	Yes
A6	40 Bazentin St	67	77	51	61	65	51	45	Yes

Table 13 shows that maximum noise levels from ILC site operations are predicted to generally be significantly lower in level than the measured existing maximum noise levels, even under adverse wind conditions at night.

4. WIND DATA

One of the DEC comments indicated that the wind data used in the noise assessment was not included in the NIA, although it is the same data as that used in Air Quality Assessment.

See Annexure 2 for the wind data provided to us by SKM which was used in the NIA.

In addition to the above data used in the NIA, hourly wind data over the year of 1999 was obtained from Lidcombe AWS after the NIA, and this data was analyzed in detail to determine suitable corrections to be applied to the typical operation noise model to account for the likelihood that noise-enhancing wind will not be steady in speed and in direction throughout any assessment period.

5. TRAFFIC NOISE

DEC noted in their submission that it would be beneficial for the traffic noise increase associated solely with ILC traffic to be reported. To address this point, traffic volumes provided to us by SKM for with and without the ILC project were used to determine the likely increase in traffic noise expected from the ILC project.

It can be seen from the traffic volume and composition tables in Annexure 3, that traffic will increase on the surrounding road network on all roads, with the exception of the Hume Highway (west-bound) where there will be a net decrease in traffic as a result of the operation of the ILC. It should be noted that the traffic numbers quoted above do not directly correspond to traffic numbers generated by on-site operations at the ILC. The reason for this is that the road network traffic modeling assumes likely route shifts that may occur as a result of the project. That is, vehicles that currently use Roberts Road may change to another route once the ILC project becomes operational.

Annexure 4 presents the traffic noise increases resulting from the ILC project. Along most of the roads surrounding the ILC site, the traffic noise increases due to the ILC project are 0 to 0.2dB(A), which is considered immeasurable, unnoticeable and inconsequential to the overall traffic noise levels of the area.

The only exception to this is Cosgrove Rd (south-bound from Hume Highway), which shows the largest increase in traffic, equating to a noise increase of +1.4dB(A) in terms of the overall night-time $L_{Aeq(9hr)}$ and daytime $L_{Aeq(15hr)}$ noise metrics, and in terms of the hourly $L_{Aeq(1hr)}$ noise metric. However, this section of road is totally within an industrial zoned area with no residential receivers affected.

With respect to the issue raised by DEC regarding 'acute' traffic noise levels [ie greater than daytime 65dB(A) $L_{Aeq(15hr)}$ and night-time 60dB(A) $L_{Aeq(9hr)}$], where 'acute' noise levels already exist the level of traffic noise increase generated from the ILC project is 0 to 0.2dB(A), which is considered minor and immeasurable. Furthermore, the NIA found that provision of noise barriers for residences is not possible as driveway access to roads is required. In summary, it would not be reasonable and feasible to reduce traffic noise levels in this case.

ANNEXURE 1 – PROFILE OF TYPICAL SITE ACTIVITIES

Daily Truck Movement Profile			
Hour Commencing	Total	% of Peak Hour Truck Activity	Noise Difference, dB(A)
00:00	7	7	12
01:00	11	11	10
02:00	11	11	10
03:00	0	0	
04:00	0	0	
05:00	18	17	8
06:00	57	55	3
07:00	88	85	1
08:00	86	83	1
09:00	78	76	1
10:00	84	82	1
11:00	81	79	1
12:00	81	79	1
13:00	97	94	0
14:00	103	100	0
15:00	92	89	0
16:00	69	67	2
17:00	53	51	3
18:00	34	33	5
19:00	33	32	5
20:00	28	27	6
21:00	21	20	7
22:00	18	17	8
23:00	9	9	11
Daily Total	**1160**		

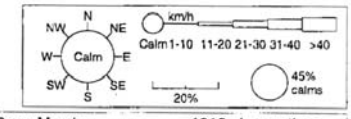
Comparison of Hourly Activities to the Peak-Hour Activities Modelled in the NIA		
Hour Commencing	% of Peak Hour Truck Activity	Noise Difference, dB(A)
Day		
07:00	85	1
08:00	83	1
09:00	76	1
10:00	82	1
11:00	79	1
12:00	79	1
13:00	94	0
14:00	**100**	**0**
15:00	89	0
16:00	67	2
17:00	51	3
Daytime 11hr Average	**80**	**1**
Evening		
18:00	**34**	**5**
19:00	32	5
20:00	27	6
21:00	20	7
Evening 4hr Average	**28**	**6**
Night		
00:00	7	12
01:00	11	10
02:00	11	10
03:00	0	
04:00	0	
05:00	17	8
06:00	**55**	**3**
22:00	17	8
23:00	9	11
Night-time 9hr Average	**14**	**8**

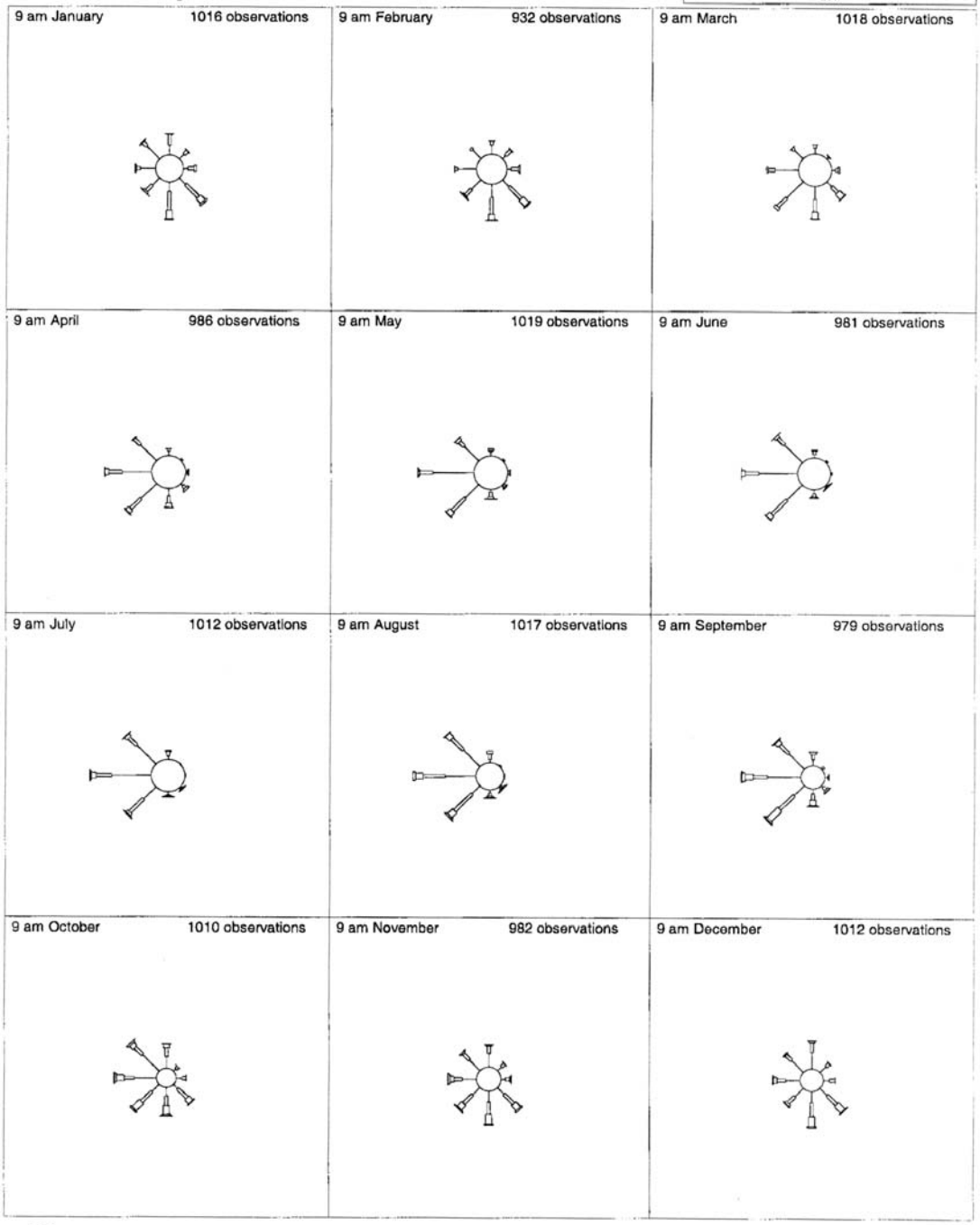
Summary of Results			
Assessment Period	% of Peak Hour Activity from Truck Profile	% of Peak Hour Activity Estimated by SPC for Typical Scenario	Conservative Noise Correction, dB(A)
Daytime			
Amenity: 11hrs (7am-6pm)	80	80	**1**
Intrusiveness: 15min (2-3pm)	100	100	**0**
Evening			
Amenity: 4hrs (6pm - 10pm)	28	40	**4**
Intrusiveness: 15min (6-8pm)	34	50	**3**
Night-time			
Amenity: 9hrs (10pm-7am)	14	20	**7**
Intrusiveness: 15min (6-7am)	55	60	**2**

ANNEXURE 2 – WIND DATA

B.4 Bankstown Airport Windroses – 9am

Wind Roses using available data between 1968 and 2001 for
BANKSTOWN AIRPORT AWS
Site Number 066137 • Locality: BANKSTOWN • Opened Jan 1968 • Still Open
Latitude 33°55'05"S • Longitude 150°59'11"E • Elevation 6.5m





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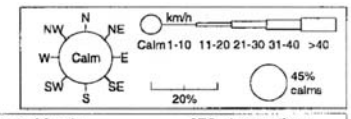
B.5 Bankstown Airport Windroses – 3pm

Wind Roses using available data between 1968 and 2001 for
BANKSTOWN AIRPORT AWS
Site Number 066137 • Locality: BANKSTOWN • Opened Jan 1968 • Still Open
Latitude 33°55'05"S • Longitude 150°59'11"E • Elevation 6.5m



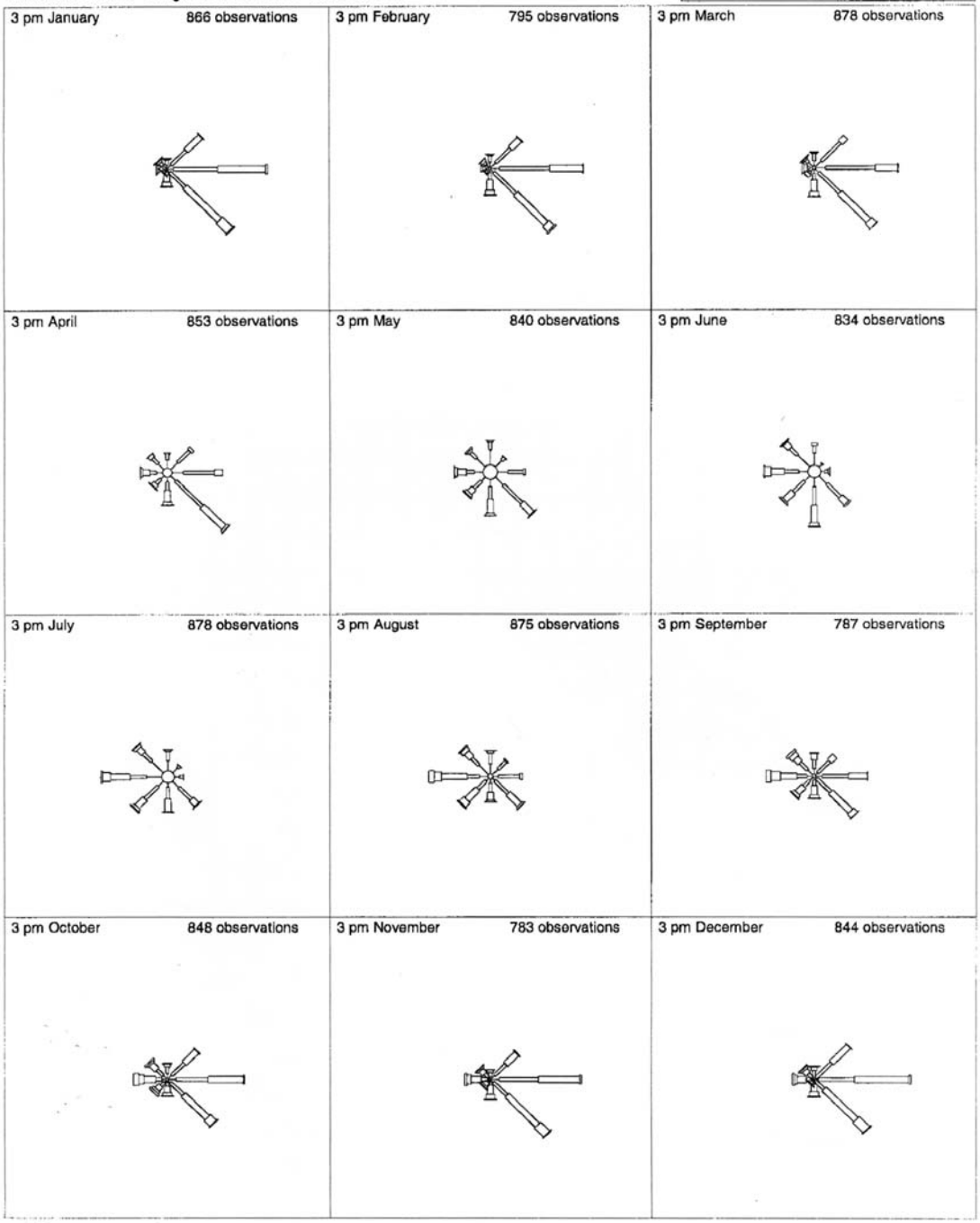


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Figure 1 - Wind rose for nocturnal hours, from dataset of hourly average winds for Lidcombe 1999

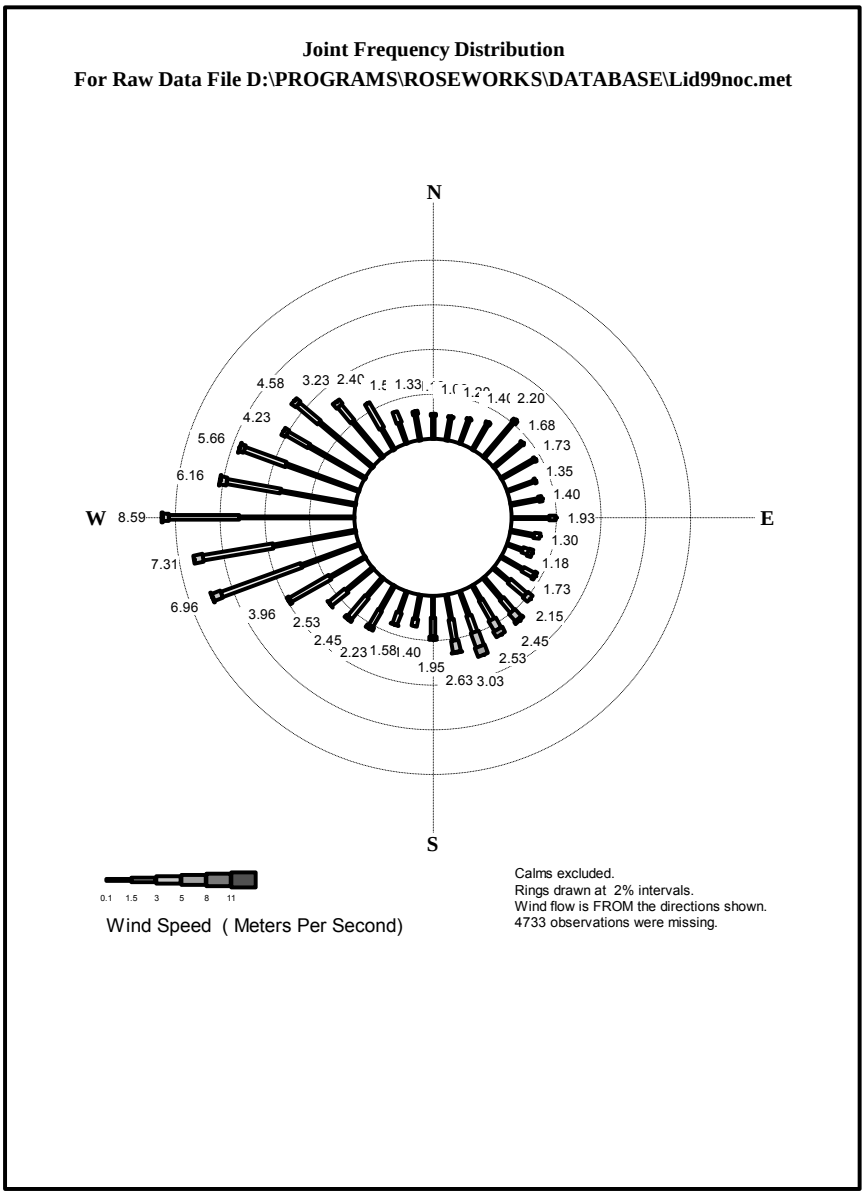


Figure 2 - As for Fig. 1, Summer

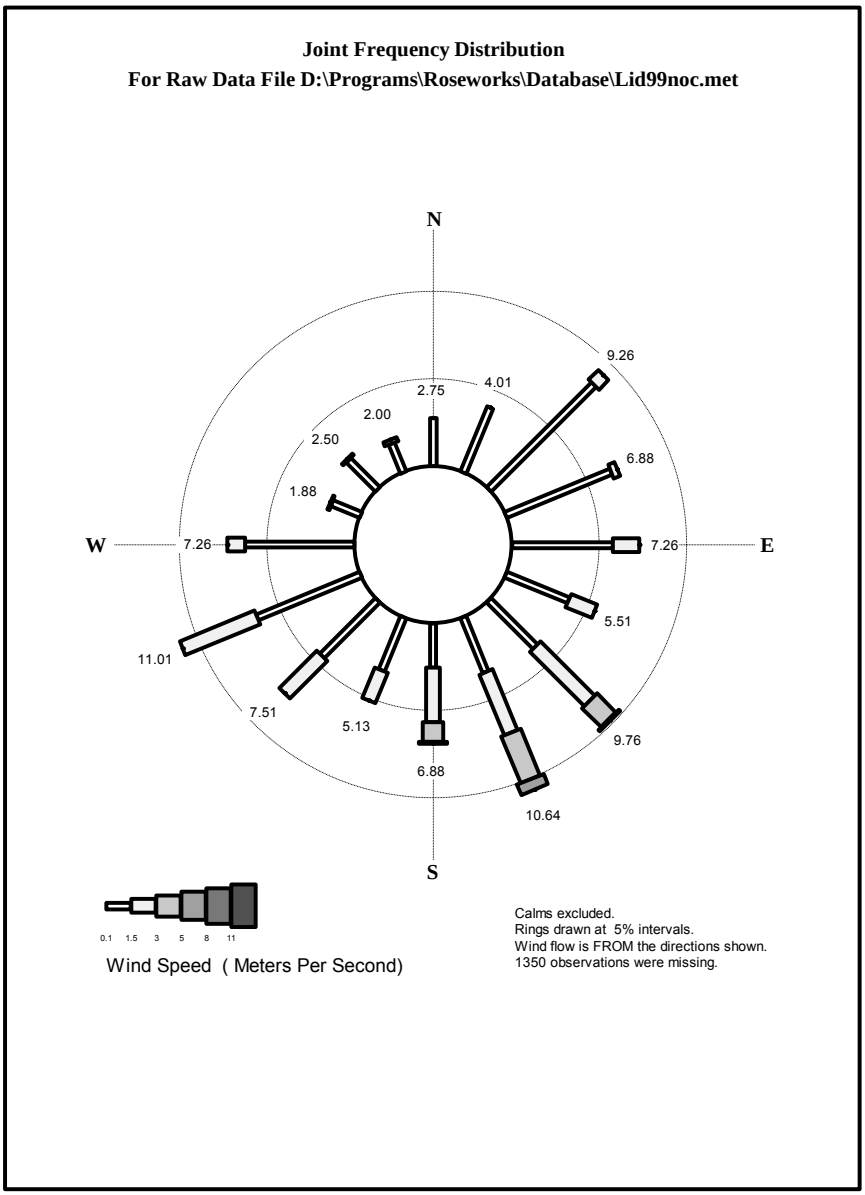


Figure 3 - As for Fig. 1, Autumn

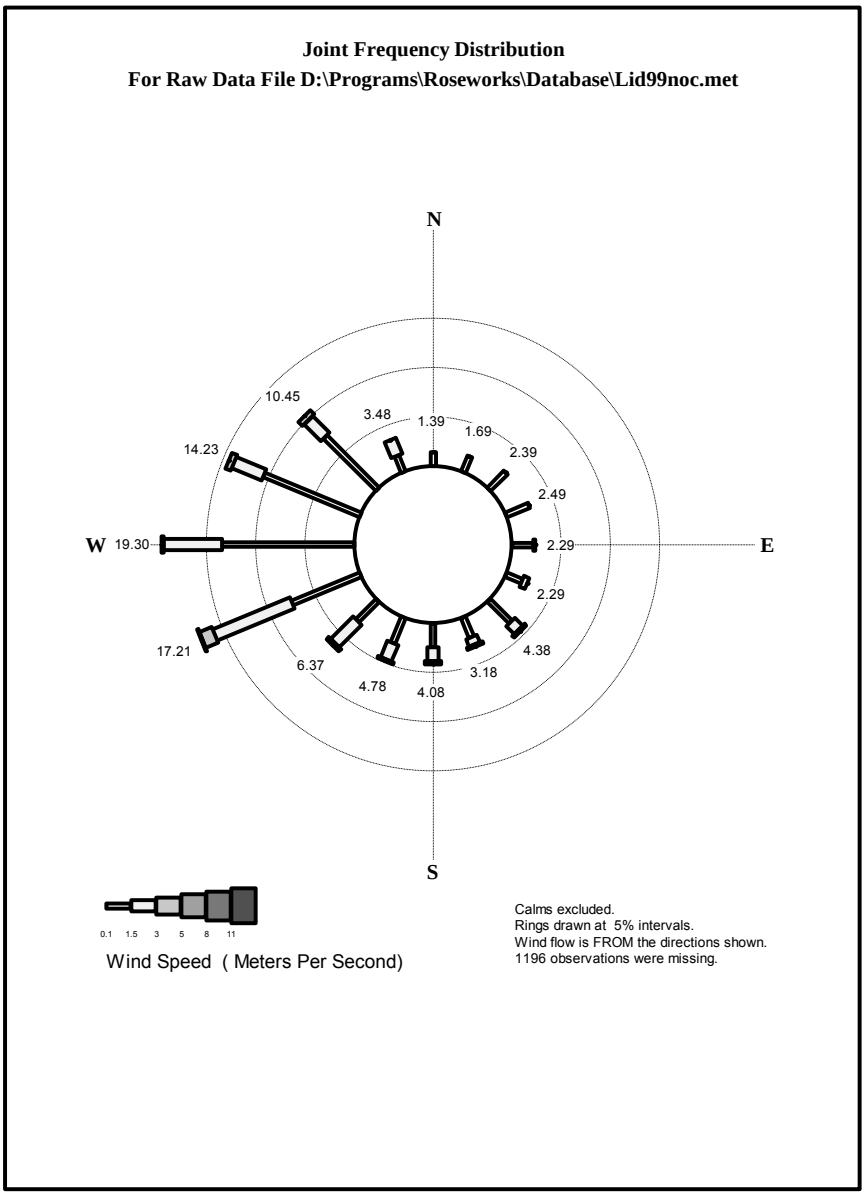


Figure 4 - As for Fig. 1, Winter

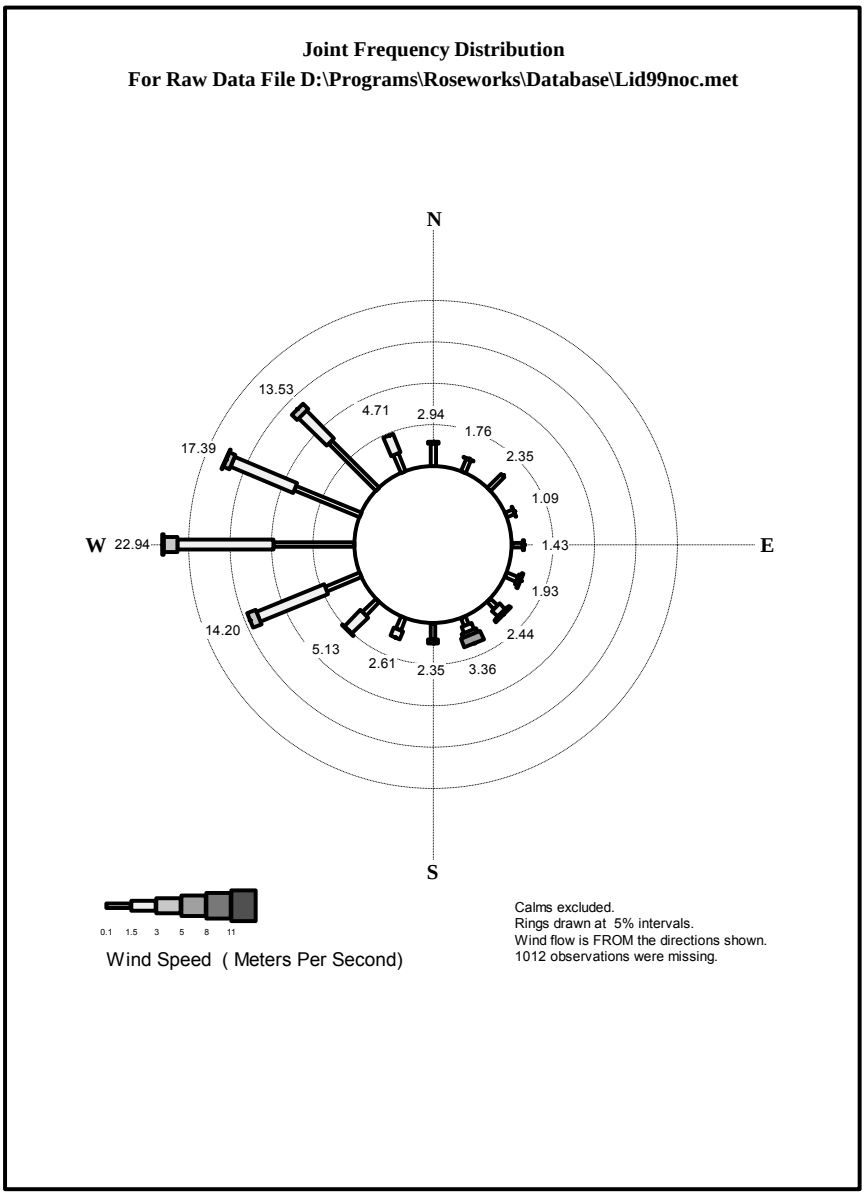
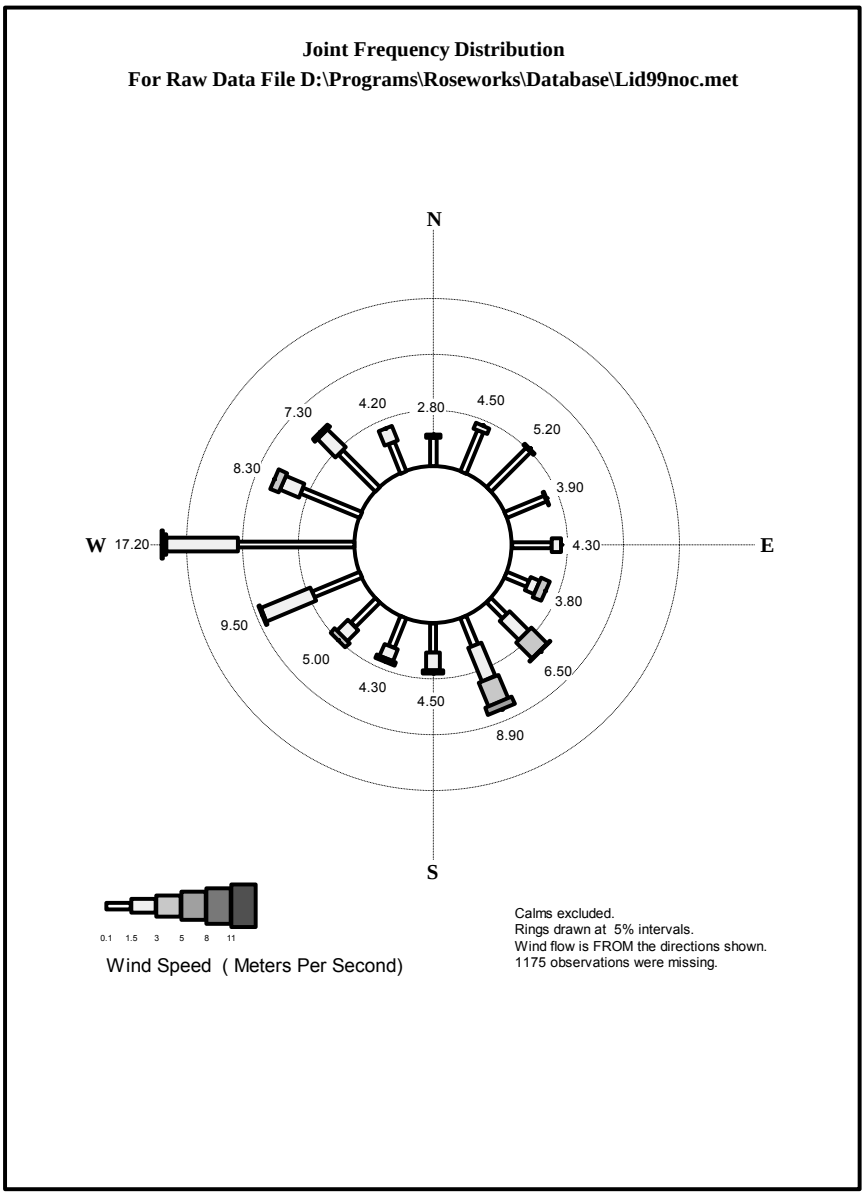


Figure 5 - As for Fig. 1, Spring



ANNEXURE 3 – TRAFFIC DATA

Traffic Volumes and Profile for Without ILC Project

Weekday Averages

Source: '[EN01709 - Noise&pollution NO ENFIELD - x04.xls]Summary'

Hour commencing	Roberts Rd NB		Roberts Rd SB		Punchbowl Rd EB		Punchbowl Rd WB		King Georges Rd NB		King Georges Rd SB		Cosgrove Rd NB		Cosgrove Rd SB		Hume Hwy EB		Hume Hwy WB	
	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles
2200	938	47	828	38	451	9	560	6	924	46	865	40	107	-	96	-	756	11	1,122	20
2300	687	44	544	33	293	6	462	7	676	43	562	34	50	-	45	-	548	18	935	18
0	332	43	295	29	166	6	247	7	322	42	263	26	43	-	39	-	269	9	530	17
100	197	40	146	31	101	4	140	3	224	46	155	33	65	-	58	-	188	19	299	15
200	162	35	108	34	88	7	91	5	205	44	136	43	65	-	58	-	112	18	211	16
300	223	47	112	35	82	11	74	3	222	47	148	46	0	-	0	-	153	37	176	16
400	321	65	229	58	134	13	108	11	321	65	263	67	0	-	0	-	214	32	216	23
500	906	131	710	118	335	29	243	21	902	131	673	112	98	-	87	-	697	74	399	43
600	2,176	234	1,491	198	928	80	595	36	2,228	240	1,549	205	285	-	255	-	1,950	163	870	89
Total 9hr	**5,943**	**687**	**4,463**	**573**	**2,577**	**166**	**2,520**	**100**	**6,024**	**704**	**4,613**	**605**	**712**	**-**	**637**	**-**	**4,887**	**381**	**4,759**	**258**
700	2,648	206	1,905	202	1,313	85	1,018	49	2,980	231	1,817	192	429	-	384	-	2,724	174	1,672	133
800	2,546	209	1,872	209	1,477	72	1,304	57	2,901	238	2,004	224	404	-	361	-	3,084	177	2,586	144
900	2,106	258	1,669	268	1,171	91	860	58	2,457	301	1,793	288	365	-	327	-	2,159	218	1,935	143
1000	1,762	275	1,625	287	827	67	773	65	1,995	312	1,675	296	410	-	367	-	1,583	168	1,550	157
1100	1,723	322	1,580	289	762	62	769	68	1,925	359	1,640	300	374	-	335	-	1,527	138	1,613	160
1200	1,774	310	1,682	280	751	61	813	66	1,924	336	1,629	271	372	-	333	-	1,450	116	1,753	174
1300	1,777	304	1,766	285	739	57	847	67	1,965	336	1,689	273	454	-	407	-	1,430	112	1,910	171
1400	1,864	275	1,949	252	838	53	1,018	71	2,184	322	1,827	236	484	-	433	-	1,592	106	2,104	174
1500	1,965	225	2,103	217	975	45	1,397	62	2,450	281	2,087	216	463	-	414	-	1,844	80	2,836	187
1600	2,142	206	2,418	162	1,037	40	1,469	62	2,378	229	2,226	149	348	-	312	-	1,813	69	3,229	200
1700	2,116	142	2,483	116	1,128	29	1,591	43	2,475	166	2,330	108	289	-	259	-	2,038	63	3,334	150
1800	1,918	113	2,315	85	1,045	23	1,418	29	2,294	135	2,176	80	191	-	171	-	1,775	37	2,883	131
1900	1,481	85	1,644	67	777	17	1,010	18	1,631	94	1,570	64	191	-	171	-	1,423	32	1,891	62
2000	1,057	63	1,102	50	602	12	765	10	1,187	71	1,143	52	157	-	141	-	1,013	18	1,459	41
2100	959	52	965	48	535	9	692	9	1,093	59	1,024	51	121	-	109	-	921	14	1,344	22
Total 15hr	**27,839**	**3,046**	**27,078**	**2,818**	**13,977**	**722**	**15,743**	**735**	**31,839**	**3,471**	**26,631**	**2,802**	**5,054**	**-**	**4,524**	**-**	**26,376**	**1,520**	**32,097**	**2,049**
Total 24hr	**33,782**	**3,733**	**31,541**	**3,392**	**16,554**	**888**	**18,263**	**835**	**37,863**	**4,176**	**31,244**	**3,407**	**5,766**	**-**	**5,161**	**-**	**31,262**	**1,901**	**36,856**	**2,307**

Sources for Hourly Profiles

Roberts Rd	Classified Count undertaken for this study, February 05
Punchbowl Rd	Classified Count undertaken for this study, February 05, at Georges River Rd East of Coronation Rd
King Georges Rd	RTA Permanent Count Station 24008, 2002 data
Cosgrove Rd	Assume same daily profile as has been assumed as the operating profile for the ILC. Note that this may result in an over-estimate of night-time traffic.
Hume Hwy	Classified Count undertaken for this study, February 05, at Hume Hwy East of Cosgrove Rd

Locations

Roberts Rd	South of Norfolk Rd
Punchbowl Rd	East of Cosgrove Rd
King Georges Rd	South of Lakemba Street
Cosgrove Rd	South of Hume Highway
Hume Hwy	East of Roberts Rd / Centenary Dr

Traffic Volumes and Profile for With ILC Project

Weekday Averages

Source: '[EN01709 - Noise&pollution NO ENFIELD - x04.xls]Summary'

Hour commencing	Roberts Rd NB		Roberts Rd SB		Punchbowl Rd EB		Punchbowl Rd WB		King Georges Rd NB		King Georges Rd SB		Cosgrove Rd NB		Cosgrove Rd SB		Hume Hwy EB		Hume Hwy WB	
	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles
2200	938	47	828	38	456	9	571	6	925	-	871	-	112	-	131	-	762	12	1,105	20
2300	687	44	544	33	296	6	471	7	677	-	566	-	53	-	61	-	552	18	921	18
0	332	43	295	29	168	6	252	7	323	-	265	-	45	-	53	-	271	9	522	16
100	197	40	146	31	102	4	143	3	224	-	157	-	68	-	79	-	189	19	295	15
200	162	35	108	34	89	7	93	5	205	-	137	-	68	-	79	-	113	18	208	16
300	223	47	112	35	83	12	76	3	223	-	149	-	0	-	0	-	154	37	173	16
400	322	65	229	58	136	13	111	11	322	-	265	-	0	-	0	-	216	33	212	23
500	906	132	710	118	338	30	248	21	903	-	678	-	102	-	120	-	702	75	393	43
600	2,177	234	1,491	198	938	81	608	37	2,232	-	1,560	-	299	-	348	-	1,966	164	857	88
Total 9hr	**5,945**	**688**	**4,463**	**573**	**2,605**	**167**	**2,572**	**102**	**6,034**	**-**	**4,648**	**-**	**747**	**-**	**871**	**-**	**4,926**	**384**	**4,687**	**254**
700	2,649	206	1,905	202	1,327	86	1,039	50	2,985	-	1,831	-	450	-	525	-	2,746	176	1,647	131
800	2,547	209	1,872	209	1,493	73	1,331	58	2,906	-	2,019	-	423	-	494	-	3,109	178	2,548	142
900	2,107	258	1,669	268	1,184	92	878	59	2,462	-	1,807	-	383	-	447	-	2,176	219	1,906	141
1000	1,763	276	1,625	287	836	67	789	67	1,998	-	1,687	-	430	-	502	-	1,596	169	1,527	154
1100	1,724	322	1,580	289	770	62	785	70	1,928	-	1,652	-	392	-	457	-	1,539	139	1,589	158
1200	1,775	310	1,682	280	759	61	830	68	1,927	-	1,641	-	390	-	455	-	1,462	117	1,726	171
1300	1,778	304	1,766	285	747	57	864	69	1,969	-	1,702	-	477	-	556	-	1,442	113	1,881	169
1400	1,864	275	1,949	252	847	53	1,039	73	2,187	-	1,841	-	508	-	593	-	1,605	107	2,072	172
1500	1,965	225	2,103	217	985	45	1,426	64	2,454	-	2,102	-	486	-	567	-	1,859	81	2,794	184
1600	2,142	206	2,418	162	1,048	41	1,499	64	2,382	-	2,243	-	365	-	426	-	1,828	70	3,180	197
1700	2,116	142	2,483	116	1,141	29	1,624	43	2,479	-	2,348	-	303	-	353	-	2,055	63	3,284	148
1800	1,919	113	2,315	85	1,057	23	1,447	29	2,298	-	2,193	-	200	-	234	-	1,789	37	2,840	129
1900	1,482	85	1,644	67	786	17	1,031	18	1,634	-	1,582	-	200	-	234	-	1,434	32	1,863	61
2000	1,057	63	1,102	50	609	12	781	10	1,189	-	1,151	-	165	-	192	-	1,021	18	1,437	40
2100	960	52	965	48	541	9	706	9	1,095	-	1,032	-	127	-	149	-	928	15	1,324	22
Total 15hr	**27,850**	**3,047**	**27,078**	**2,818**	**14,128**	**730**	**16,069**	**750**	**31,892**	**-**	**26,830**	**-**	**5,301**	**-**	**6,185**	**-**	**26,589**	**1,532**	**31,617**	**2,018**
Total 24hr	**33,795**	**3,734**	**31,541**	**3,392**	**16,733**	**897**	**18,641**	**852**	**37,927**	**-**	**31,478**	**-**	**6,048**	**-**	**7,056**	**-**	**31,515**	**1,916**	**36,305**	**2,272**

Sources for Hourly Profiles

Roberts Rd	Classified Count undertaken for this study, February 05
Punchbowl Rd	Classified Count undertaken for this study, February 05, at Georges River Rd East of Coronation Rd
King Georges Rd	RTA Permanent Count Station 24008, 2002 data
Cosgrove Rd	Assume same daily profile as has been assumed as the operating profile for the ILC. Note that this may result in an over-estimate of night-time traffic.
Hume Hwy	Classified Count undertaken for this study, February 05, at Hume Hwy East of Cosgrove Rd

Locations

Roberts Rd	South of Norfolk Rd
Punchbowl Rd	East of Cosgrove Rd
King Georges Rd	South of Lakemba Street
Cosgrove Rd	South of Hume Highway
Hume Hwy	East of Roberts Rd / Centenary Dr

ANNEXURE 4 – TRAFFIC NOISE LEVEL INCREASES DUE TO ILC

Traffic Volumes and Profile Increases Resulting from ILC Project

Traffic Noise Increases Resulting from ILC Project

Hour commencing	Roberts Rd NB		Roberts Rd SB		Punchbowl Rd EB		Punchbowl Rd WB		King Georges Rd NB		King Georges Rd SB		Cosgrove Rd NB		Cosgrove Rd SB		Hume Hwy EB		Hume Hwy WB	
	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles
2200	0	0	0	0	5	0	12	0	2	-	6	-	5	-	35	-	6	0	-17	0
2300	0	0	0	0	3	0	10	0	1	-	4	-	2	-	16	-	4	0	-14	0
0	0	0	0	0	2	0	5	0	1	-	2	-	2	-	14	-	2	0	-8	0
100	0	0	0	0	1	0	3	0	0	-	1	-	3	-	21	-	2	0	-4	0
200	0	0	0	0	1	0	2	0	0	-	1	-	3	-	21	-	1	0	-3	0
300	0	0	0	0	1	0	2	0	0	-	1	-	0	-	0	-	1	0	-3	0
400	0	0	0	0	1	0	2	0	1	-	2	-	0	-	0	-	2	0	-3	0
500	0	0	0	0	4	0	5	0	2	-	5	-	5	-	32	-	6	1	-6	-1
600	1	0	0	0	10	1	12	1	4	-	12	-	14	-	94	-	16	1	-13	-1
Total (9hr) Change	2	0	0	0	28	2	52	2	10	-	35	-	35	-	234	-	39	3	-71	-4
Total (9hr) 'No ILC'	5,943	687	4,463	573	2,577	166	2,520	100	6,024	704	4,613	605	712	-	637	-	4,887	381	4,759	258
Total (9hr) 'With ILC'	5,945	688	4,463	573	2,605	167	2,572	102	6,034	-	4,648	-	747	-	871	-	4,926	384	4,687	254
Leq (9hr) Increase	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**0.1**	**0.1**	**0.0**	**-**	**0.0**	**-**	**0.2**	**-**	**1.4**	**-**	**0.0**	**0.0**	**-0.1**	**-0.1**
700	1	0	0	0	14	1	21	1	5	-	14	-	21	-	141	-	22	1	-25	-2
800	1	0	0	0	16	1	27	1	5	-	15	-	20	-	133	-	25	1	-39	-2
900	1	0	0	0	13	1	18	1	4	-	13	-	18	-	120	-	17	2	-29	-2
1000	1	0	0	0	9	1	16	1	3	-	13	-	20	-	135	-	13	1	-23	-2
1100	1	0	0	0	8	1	16	1	3	-	12	-	18	-	123	-	12	1	-24	-2
1200	1	0	0	0	8	1	17	1	3	-	12	-	18	-	122	-	12	1	-26	-3
1300	1	0	0	0	8	1	18	1	3	-	13	-	22	-	149	-	12	1	-29	-3
1400	1	0	0	0	9	1	21	1	4	-	14	-	24	-	159	-	13	1	-31	-3
1500	1	0	0	0	11	0	29	1	4	-	16	-	23	-	152	-	15	1	-42	-3
1600	1	0	0	0	11	0	30	1	4	-	17	-	17	-	114	-	15	1	-48	-3
1700	1	0	0	0	12	0	33	1	4	-	17	-	14	-	95	-	16	1	-50	-2
1800	1	0	0	0	11	0	29	1	4	-	16	-	9	-	63	-	14	0	-43	-2
1900	1	0	0	0	8	0	21	0	3	-	12	-	9	-	63	-	11	0	-28	-1
2000	0	0	0	0	7	0	16	0	2	-	9	-	8	-	52	-	8	0	-22	-1
2100	0	0	0	0	6	0	14	0	2	-	8	-	6	-	40	-	7	0	-20	0
Total (15hr)	11	1	0	0	151	8	326	15	53	-	199	-	247	-	1,661	-	213	12	-480	-31
Total (15hr) 'No ILC'	27,839	3,046	27,078	2,818	13,977	722	15,743	735	31,839	3,471	26,631	2,802	5,054	-	4,524	-	26,376	1,520	32,097	2,049
Total (15hr) 'With ILC'	27,850	3,047	27,078	2,818	14,128	730	16,069	750	31,892	-	26,830	-	5,301	-	6,185	-	26,589	1,532	31,617	2,018
Leq (15hr) Increase	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**0.1**	**0.1**	**0.0**	**-**	**0.0**	**-**	**0.2**	**-**	**1.4**	**-**	**0.0**	**0.0**	**-0.1**	**-0.1**

Sources for Hourly Profiles

Roberts Rd	Classified Count undertaken for this study, February 05
Punchbowl Rd	Classified Count undertaken for this study, February 05, at Georges River Rd East of Coronation Rd
King Georges Rd	RTA Permanent Count Station 24008, 2002 data
Cosgrove Rd	Assume same daily profile as has been assumed as the operating profile for the ILC. Note that this may result in an over-estimate of night-time traffic.
Hume Hwy	Classified Count undertaken for this study, February 05, at Hume Hwy East of Cosgrove Rd

Locations

Roberts Rd	South of Norfolk Rd
Punchbowl Rd	East of Cosgrove Rd
King Georges Rd	South of Lakemba Street
Cosgrove Rd	South of Hume Highway
Hume Hwy	East of Roberts Rd / Centenary Dr

Appendix D Industry Responses

Submissions Industry: AIR QUALITY

IssueCategory	Comments	Response	Stakeholder ID	Name
Air quality	The Property council supports the proposal because it contributes to reducing green house gas emissions associated with the very high truck movements that will occur if the facility is not constructed.	Noted.	844	Property Council **Submission 327**

Submissions Industry: AMENITY QUALITY OF LIFE

IssueCategory	Comments	Response	Stakeholder ID	Name
Amenity Quality of Life	A major facility of this size will inevitably result in some impacts at a local level. Having reviewed the detail of the proposal the Council supports the proposed development as achieving an appropriate balance between the strategic (national state and regional) benefits accruing from the facility and the localised amenity effects. It is considered that careful planning and implementation strategies will minimise potential local impacts to a level where they do not override the critical benefits arising from construction of this facility.	Noted. Noted.	844	Property Council **Submission 327**

Submissions Industry: ECONOMIC BENEFIT

IssueCategory	Comments	Response	StakeholderID	Name
economic benefit	The development of intermodals needs to be undertaken now so as to meet the demand which will result from the forecast increase in containerised freight. The inclusion of cross docking/warehousing facilities together with container storage will lead to efficiencies for on-site and off site industry and will assist in combating the relatively high cost of doing business in Sydney. Believes this will make Sydney a more attractive place for industry and lessen the incentive for the logistics industry to locate elsewhere.	Noted.	580	Walker Corporation **Submission 151**
economic benefit	Believes the ILC is in the long term interests of the State. The proposed ILC will be a significant part of a much wider program to build an economically competitive and environmentally sustainable freight network The expansion of Port Botany and its associated infrastructure, such as the ILC network is imperative if Sydney is to retain its position as the premier port in Australia. Land and sea infrastructure in Queensland, Victoria and the Northern Territory is becoming increasingly competitive. Brisbane Ports Corporation has enough vacant land to continue expanding, and Victoria currently has enough vacant land to continue expanding, and Victoria currently has a highly regarded road transport network. The Enfield ILC is a key part of building an economically competitive and environmentally sustainable industry	Noted.	579	State Chamber Of Commerce **Submission 67**
economic benefit	The development of the ILC Enfield would result in a reduced cost base that would enable Weston Cereal Industries to further increase export business and local employment. (Kindly note Weston Cereal Industries was awarded the NSW Premier's Exporter of the Year Awards for the highest growth out of Sydney Port) George Weston Foods Limited has recently built a $150m bakery at Chullora in close proximity to the proposed ILC at Enfield. The development of the ILC Enfield would enable this business to access imported ingredients in a more timely and cost effective manner. It would also provide opportunities to increase export business	Noted.	577	Weston Milling **Submission 57**
economic benefit	The shipping and logistics industry as a whole would be the beneficiaries of an intermodal strategy and the development of intermodal sites around Sydney, ultimately passing on the benefits to the consumer. It is the State government's responsibility to ensure that the NSW trade is not diverted through other states (at an additional cost to the NSW consumer), which will no doubt occur if the necessary infrastructure is not made available for an economical and sustainable operation	Noted.	575	Shipping Aust **Submission 40**

Submissions Industry: ESD

IssueCategory	Comments	Response	StakeholderID	Name
ESD	The Property council has a strong interest in supporting and contributing to approval and development of major infrastructure that supports and benefits the long term sustainable development of Sydney.	Noted	844	Property Council **Submission 327**

Submissions Industry: GOVERNMENT POLICY

Issue Category	Comments	Response	Stakeholder ID	Name
government policy	The Chamber believes that it is essential that the Enfield ILC is approved to meet the target of 40% of freight movements on the rail network by 2011.	Noted.	579	State Chamber Of Commerce **Submission 67**
government policy	Supports the development of the current Enfield Marshalling Yards into an extremely useful and strategic intermodal terminal to assist the NSW Government to achieve its stated aim of 40% of port freight being transported to and from the ports by rail.	Noted.	576	CFCL **Submission 41**
government policy	The Council considers the application submitted by SPC as one of vital and strategic importance for the efficient and viable management of freight movements in the metropolitan area and play a key role in transferring freight movements form road to rail. The construction of the ILC at Enfield will provide a central plank of the NSW Government's Sydney Intermodal terminal network proposed in the FIAB report released in July 2005. It also aligns with the Metropolitan Strategy released in November 2005 which confirmed the significance of efficient freight movement to Sydney's economy and highlighted the importance of enhancing freight movement network to accommodate the growing needs of the city. The Council supports the development at Enfield as being a crucial element in supporting the continued capacity and efficiency of the freight network. It forms an essential part of the Government's overall freight movement strategy aimed at increasing the proportion of containers transported to and from Port Botany by rail form the current 20% to 400% by 2011. The development of the ILC at Enfield should not be considered in isolation of the Government's plan for a network of intermodla facilities across Sydney's west and south west. Construction of this intermodal network will be essential to provide sufficient freight movement capacity and spread associated employment and business activity across a series of centres. The Enfield facility is very much a part of an overall network., its construction first reflects the fact that it is currently the only facility of sufficient size (60 hectares), located on available land, industrial zoned, supported by infrastructure which is able to be delivered in the near term.	Noted. Noted. Noted. Noted. Noted.	844	Property Council **Submission 327**

Submissions Industry: INDUSTRY OPPORTUNITIES

IssueCategory	Comments	Response	StakeholderID	Name
industry opportunities	The development of the ILC provides an opportunity to an open access locomotive provisioning shed and workshop and CFCL could provide this service.	Noted.	576	CFCL **Submission 41**

Submissions Industry: LAND USE

IssueCategory	Comments	Response	StakeholderID	Name
Land use	As NSWRTA recently advised the Premier's Department in response to recommendations of the FIAB, it is important that an opportunistic approach be adopted when intermodla development opportunities such as those at Enfield arise because of the scarcity of potentially viable sites.	Noted.	845	NSW Road Transport Association **Submission 326**

Submissions Industry: MANAGEMENT

Issue Category	Comments	Response	StakeholderID	Name
management	Provide environmental safeguards on noise and light spill designation of residential areas surrounding terminals and the adoption of 'zero tolerance' policies to container road traffic travelling through them community consultation committees being mandatory in respect of all terminals.	To be addressed in preparation of the Construction, Operation Environmental and Local Area Traffic Management Plans.	824	Infrastructure Partnership **Submission 184**

Submissions Industry: RAIL ISSUES

Issue Category	Comments	Response	Stakeholder ID	Name
Rail Issues	It is essential that in order to increase the number of freight movements on the rail network, that the Enfield project proceeds Congestion comes at a great cost to both business and the community, we therefore welcome the proposals to shift freight movements form road to rail with the Enfield ILC being part of this key objective.	Noted. Noted.	579	State Chamber Of Commerce **Submission 67**

Submissions Industry: SITE QUALITIES

IssueCategory	Comments	Response	Stakeholder ID	Name
Site qualities	From interaction with importing and exporting companies believes the central location of the Enfield site makes it ideal for an intermodal terminal being close to the freight's source or destination. The size of the site and its vicinity to major arterial roads and the rail freight network also cements its strategic importance for Sydney's freight distribution network.	Noted.	580	Walker Corporation **Submission** 151
Site qualities	The Enfield site has many attributes such as its proximity to the market place, freightline, trucking routes and its location in an industrial area.	Noted.	579	State Chamber of Commerce **Submission** 67
Site qualities	Being an intermodal terminal ourselves, we strongly believe in the concept of moving freight to key locations that can support different modes of transport under a common user open access environment	Noted.	578	MIST **Submission** 66
Site qualities	With the port projecting a tripling of capacity in twenty years time, something needs to be done now to make sure that the roads of Sydney don't become one long container truck parking lot. The solution is to move by rail, and to do that intermodal terminals located close to where containers are headed or come from. Enfield is an ideal location to be the first of a network of intermodals terminals and should be developed now.	Noted.	575	Shipping Aust **Submission** 40
Site qualities	The NSWRTA supports in principle the development of projects , including this proposal that represents a substantial improvement to land side infrastructure to enable more efficient movement of containers to and from Port Botany	Noted.	845	NSW Road Transport association **Submission** 326
Site qualities	The Enfield site ahs a long history of use for rail and associated activity and the proposed intermodal facility is a rational and appropriate extension of this long standing use. The development of the logistics centre at the proposed Enfield site is well located to the freight distribution markets needing improved servicing and will capitalise on the long established infrastructure already existing at the site. The facility at this location is considered more appropriate than possible alternative sites.	Noted.	844	Property Council **Submission 327**

Submissions Industry: SOCIO ECONOMIC

IssueCategory	Comments	Response	Stakeholder ID	Name
Socio Economic	The Property council supports the proposal because the facility directly supports and complements the massive and nationally significant investment made to enhance freight operations at Port Botany. Proposal will create significant and wide ranging economic benefits and job creation. The facility is expected to boost industrial employment opportunities directly and indirectly. It will be built on land already zoned fro industrial use but currently underutilised for this purpose.	Noted. Noted.	844	Property Council **Submission 327**

IssueCategory	Comments	Response	Stakeholder ID	Name
Traffic	The existing infrastructure will be less able to cope as the trade through the Sydney Ports increases. Transport routes will become choked with trucks and Sydney's reputation as an efficient port and trading city will not be able to be sustained. In our view it would be environmental vandalism to not develop a conveniently placed intermodal terminal, which will better facilitate the movement of cargo into, out of and around Sydney. The ILC addresses our concerns so we support the development of it.	Noted.	826	CBFCA **Submission no number**
Traffic	The development of inland terminals and the expanded use of rail for freight distribution is essential to combat the ever increasing demand on Sydney's roads form all sources.	Noted.	580	Walker Corp **Submission 151**
Traffic	The FIAB's report 'Railing Port Botany's Containers' demonstrated the importance of the Enfield ILC as a key component of an intermodal network. Once established the intermodal network will help to ease the pressure on Sydney's road network by shifting more freight movements to the rail network.	Noted.	579	State Chamber Of Commerce **Submission 67**
Traffic	The Property council supports the proposal because it contributes towards a significant reduction in freight movements on the road network, in particular significant reductions in the number of heavy truck using already congested city road networks	Noted.	844	**Submission 327**
Traffic	For intermodal terminals to be commercially viable they also need unimpeded rail and road access to attract business and be well designed and managed. Therefore any integrated planning strategy must ensure that landside links to and from Enfield to port Botany and the motorway network must be designed to encourage terminal use. The terminal operator must engage genuinely with industry to resolve operational issues. NSW RTA also believes it is important to address perceived community concerns regarding rat running by truck drivers. Despite perceptions, this is not a common practice at all, especially for semi trailer and B -double operations, nor is it condoned in any way by NSW RTA. With very few exceptions, operators and their drivers are law abiding and recognise the advantages of the arterial road network. Operationally it is difficult to navigate on local roads. Load limits are respected and abided by except where deliveries need to be made and there is no alternative route. Therefore NSWRTA is confident that 'rat running' would either be a very minor issue or not an issue at all	Noted.	845	NSW Road Transport Inc **Submission 326**

Appendix B Council Responses

Issue Category	Comments	Response	Stakeholder ID	Name
Air Quality	The proposed ILC will have an adverse impact on nearby residences in the Cosgrove Rd/Blanche St area from particulate matter during the construction phase even with mitigation measures in place. The modelling of air quality impacts from road traffic and the conclusion that no exceedances or significant impact will result from road traffic are seriously questioned due to inaccurate traffic volume data.	The Dust Management Plan to be prepared as part of the Construction EMP would minimise the potential for off site emissions. This would include procedures for real time dust monitoring to minimise the impacts on local residences by managing the site earth works during periods of wind blowing towards the sensitive receivers. The traffic forecasting is addressed in other sections. The air modelling using the traffic data followed standard methodology accepted by the DEC.	832	Strathfield Council **DoP Submission Nos 121 & 159**
Air Quality	Whilst it could be argued that Sydney Ports Corporation does not have responsibility for the air emissions from locomotives travelling to and from the Intermodal Logistics Centre (ILC) at Enfield, Council believes that the State Government does and therefore the Environmental Assessment (EA) report should consider the bigger picture and include this issue in the assessment. A revised air quality report should be submitted to the Minister prior to approval. The report should model and assess air quality impacts from predicted road traffic using accurate traffic volume data and consider air quality associated with locomotives using the dedicated freight rail line between Port Botany and the proposed site. **Construction management** A Dust Management Plan, Construction Environmental Management Plan and Operational Environmental Management Plan should be prepared prior to approval and conditions be imposed to ensure their implementation. If approval is granted the following conditions should apply: • Real time monitoring devices shall be installed at sensitive receiver sites and a meteorological monitoring station shall be installed onsite. • Construction operations should cease if weather conditions develop that will likely cause air quality criteria to be exceeded.	The appropriate approach to the management of effects from the rail freight line through is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will be happy to work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. There are no changes proposed to the traffic modelling and, as a consequence, no requirements for an amended air quality report. The Dust Management Plan and operational management plan containing details of air quality management measures would be prepared prior to construction commencement. The Dust Management Plan would include details of a dust level monitoring program undertaken prior to the commencement of earthworks and during construction works. A meteorological monitoring station will also be installed at the ILC site when background monitoring commences. Construction operations would be modified if off-site real-time dust monitoring indicates ambient air quality impacts.	832	Strathfield Council **DoP Submission Nos 121 & 159**

Issue Category	Comments	Response	Stakeholder ID	Name
Air Quality	The EA has not assessed the air quality impacts of diesel emissions along the freight line corridor. This is contrary to the State Government's own findings that fine particles in diesel emissions are a significant air quality issue in the Sydney Basin and a potential health risk. Given that the corridor is electrified, consideration should be given to using electric trains.	The appropriate approach to the management of effects from the rail freight line through is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will be happy to work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	816	Canterbury Council **DoP Submission Nos 157 & 162**
Air Quality	• Air Quality impacts; Council is concerned about the air quality impacts to the residents in Greenacre, particularly during the construction stage. Whilst some mitigation measures have been suggested, these seem to be directed more towards the residents east of the site, rather than the residents in Greenacre. Council is concerned about the air quality impacts to the residents in Greenacre, particularly during the construction stage. Whilst some mitigation measures have been suggested, these seem to be directed more towards the residents east of the site, rather than the residents in Greenacre. Councils Concerns about the Air Quality Assessment Council concerns with the Air Quality assessment are as follows. Air Quality Impacts Due to Traffic. We note that the relevant criteria appear not to be exceeded during the operation of the.facility. However we also believe that the impacts due to trucks and traffic should have been included in this assessment rather than being treated as a separate item, since they are clearly associated with the operational phase of the facility. We would like the operational assessment reviewed to include the combined effects of all equipment and associated traffic and if this is done then we will accept the findings of the assessment regarding operational air quality impacts. However when undertaking this review it is important that the assumptions about the decrease in traffic movements in some roads be verified, since this clearly has an important bearing on the air quality impacts associated with traffic. Management of Air Quality Council agrees that there is a need for air quality impacts to be included as part of an Environmental management Plan for the site. It is important however that details of the plan be included in as part of the EAR, and submitted for consideration before any approval is given to that facility. The plan should include measures	Residents surrounding the site on all sides would be considered during the preparation of the Construction Dust Management Plan. Further mitigation measures will be considered and implemented when the construction program is developed and details are known. See above comment. It would be inappropriate to include the traffic air quality data in the same assessment as that for the site air quality. The impacts assessment for roads is a local one, and the two impact assessments are not cumulative. Truck and other vehicle movements on the site, however, were included in the site assessment. Details of the construction methodology and information on the final design needs to be available in order to provide accurate management measures. The Dust Management Plan would be developed by the Construction Contractor in consultation with DEC and	815	Bankstown Council **DoP Submission Nos 164 & 328 159**

Issue Category	Comments	Response	Stakeholder ID	Name
	that will be effective in managing air quality impacts. In this regard, whilst Council would agree with many of the recommendations for managing air quality that is included in the EAR, some appear to need further consideration. For example, the suggestion to comply with "Best Practice" in the selection and use of equipment needs further development, as the feasibility and implications of this recommendation for the proposal are not clear.	SPC. This Plan will provide further details in relation to best practice etc.		
	Construction Impacts. Council has a number of concerns regarding air quality during construction: No monitoring of NO2 levels during construction. It is noted that only PM10 levels were monitored and not NO2 levels during construction. Whilst we accept that dust would be the main impacts during construction there would also be machinery involved that emit NO2 and which should have been considered in the assessment. Until this has been assessed we remain concerned about air quality impacts during construction.	Further consideration of the need for NO2 monitoring during construction would be undertaken during preparation of the Construction Environmental Management Plan.		
	Dust Impacts More significantly however we are concerned about the potential dust impacts on some residences in Greenacre during construction. Whilst some of the mitigation measures (the requirement to cease work when the wind speed is over 5m/sec), will manage these impacts to some extent, the relevant figures still show that some residences in Greenacre will be affected by impacts in excess of EPA criteria. The other suggested mitigation measure of ceasing work when the wind is blowing from the 210 - 340 sector will have no impact because the affected sites in Greenacre are downwind from this direction. More consideration needs to be given on how to reduce impacts to the residents of Greenacre. For example, was consideration given to ceasing work when the winds were in the 90-180 sector, as this may have been effective in reducing air quality impacts on Greenacre residents. Additionally, the fact that there may be some exceedances of the criteria is also glossed over to some degree by simple reference to the preparation of a Dust management Plan to help manage impacts, rather than specify specific measures that we could be confident would reduce dust impacts to an acceptable level. If a dust management plan is going to be a recommendation (and we agree that it would be a good idea) then it should be developed in detail and submitted for assessment as part of the assessment process for the proposal, and should include measures that	The EA clearly identified that despite some exceedances of the criteria used, the dust generated by the proposed construction works would be able to be managed adequately. A detailed Dust Management Plan will be developed before construction begins. With the benefits of better knowledge of the construction schedules and methodologies, the DMP will provide more detailed mitigation measures to manage the dust levels so that the criteria are not exceeded. This would include real time monitoring of dust levels and a response process to manage them. The PM_{10} modelling methodology for construction phase impacts is considered reasonable, whereby initially the modelling was undertaken with no dust controls measures in place, and as expected impacts showed exceedance of the relevant criteria. Various dust control measures were progressively implemented until a level of control was achieved that showed impacts could be effectively managed. These controls included sealing of some surfaces that would be otherwise left unsealed, high level watering of the site and wind speed and wind direction restrictions, which may be required. In reality dust impacts will be managed by various means, including the physical controls assumed in the modelling and a sophisticated real-time PM_{10} monitoring program which will advise the construction contractor of any dust impacts within sensitive receiver locations should these occur. The contractor can then (almost immediately)		

Issue Category	Comments	Response	Stakeholder ID	Name
	will demonstrate that dust, impacts can be managed to an acceptable level.	alter construction works which may include restriction of works at certain locations in certain wind conditions such that impacts are effectively managed, without any exceedance of the relevant criteria. A protocol will be devised in consultation with DEC to determine the appropriate response to readings greater than 50 ug/m^3		
	Other concerns. The EAR refers to a fraction of the PM 10 component, known as the PM 2.5 which is the respirable fraction of PM10, and which may be associated with health impacts. However the EAR does not individually assess impacts of PM 2.5 but says that in the future some assessment of PM 2.5 impacts should be able to be made by assessing the PM 10 impacts. Given that this could be a health related issue we would like confirmation from the relevant Government Health authority that the methodology of assessing PM2.5 impacts in this report is acceptable.	The criteria set by DEC for construction dust is measured as PM10.		
	In general, air quality impacts during construction to the residents of Greenacre are of concern to Council, and we requests that more consideration be given to reducing the air quality impacts on the residents if Greenacre. Council intends to provide further information about this matter during the proposed Hearing Panel to be convened for this proposal.	Noted.		
	CONCLUSIONS AIR Air Quality Impacts; 'Council is concerned about the air quality impacts to the residents in Greenacre, particularly during the construction stage. Whilst some mitigation measures have been suggested, these seem to be directed more towards the residents east of the site, rather than the residents in Greenacre.	Residential receivers surrounding the site would be considered during preparation of the Dust Management Plan.		

Issue Category	Comments	Response	Stakeholder ID	Name
Alternative Sites	Enfield is unsuitable site/location for an intermodal logistics terminal to be built since: ▪ As identified by the study of Honourable Milton Morris AO titled 'Independent Review of the proposed Intermodal Terminal dated February 2003, Enfield is incapable of dealing with the containers to meet the target identified by the government (i.e. 40% rail share mode). ▪ Further, in particular, its close proximity to residential area makes it unsuitable location for an intermodal logistics terminal. ▪ It is recommended that Enfield is an unsuitable site/location for an intermodal logistics centre particularly given its very close proximity to residences and findings of the Milton Morris AO report. An intermodal is not supported however, if there is a need for one it should be established further to the west of Sydney, which is the targeted area and final destination for over 60% of the freight passing through the proposed Enfield site.	The ILC will be one element in the achieving 40% rail mode share. Other intermodal areas will also need to be developed, as identified in the FIAB report. The ILC is located within an area surrounded by industrial development save the area south of Cosgrove Road (opposite the proposed community and ecological area). Enfield is considered to be a suitable site for providing a distribution network for container imports and exports whose origin or destination is in the inner and middle western suburbs of Sydney. The FIAB report prepared as part of the Government's Metropolitan Intermodal Freight Strategy for Import and Export Containers (refer Metropolitan Strategy – Transport Strategy for Sydney) supports the need for the Enfield ILC as part of a number of intermodal terminals required to serve the Sydney Basin and to achieve the Governments mode share target. As identified in the FIAB report a number of smaller intermodal terminals are proposed close to the market to reduce trucking distance to and from the terminal to distribution points. The FIAB also indicated that, not withstanding the industrial growth in the west and south west, there is a need for an intermodal facility in the central western Sydney industrial area to meet local and sub-regional requirements, and that the proposed site at Enfield should be developed for that purpose.	832	Strathfield Council **DoP Submission Nos 121 & 159**
Alternative Sites	Whilst it is understood and accepted that a significant increase in cross-metropolitan rail freight movement is necessary to cater for anticipated growth for the future, it is questionable if Enfield is the most suited location to achieve this The Operation Terminal should be closer to the containers final destination by rail. Serious consideration should be given to a "Sydney Wide" Intermodal based at Ingleburn that is closer to the documented final destination of all freight. It also has heavy rail facilities and a number of motorway options. This in my opinion would prove to be more cost effective and would provide a quality logistic infrastructure, with long-term expansion for the Sydney Basin Current access to all freeways and motorways require heavy vehicles passing residential areas. These include	See above Chapter 3 of the EA identified that the inner and middle western area of Sydney (in which the proposed ILC is located) receives up to 56% of the incoming container traffic through Port Botany. This comprises up to about 800,000 TEU per year. The development of the ILC will provide the opportunity for 300,000 TEU to be brought to the area by rail (instead of by truck). Intermodal facilities will need to be further developed in the south west (near Ingleburn) and in the west of Sydney, to cater for future growth in those areas. Existing heavy vehicles currently pass the residential areas. The M4, M5 and M7 motorways can all be	832	Strathfield Council **DoP Submission Nos 121 & 159**

Issue Category	Comments	Response	Stakeholder ID	Name
	the M4, M5 and the recently opened M7, which does not appear to have been considered in this proposal. A site location further to the west of Sydney would provide a more direct access to the motorways with minimum disruption	accessed from the Enfield ILC via the designated arterial road network, which is the most appropriate route for heavy vehicle traffic. Enfield ILC is one of many ILC facilities being considered in the wider Sydney region to help the Government achieve its 40% mode share by 2011.		

Issue Category	Comments	Response	Stakeholder ID	Name
amenity/quality of life	Through community consultation local residents have expressed a number of concerns in regard to this proposal including road congestion, noise from road and rail traffic, air pollution, general loss of amenity due to 24 hour operation, increased traffic accidents, possible hazardous incidents and loss of on street parking. Further investigation is required to determine the full impact of the proposal on the local residents and community before a decision is made on whether the proposal should proceed	The potential impacts on community amenity were described in detail in Chapter 17 of the EA. The potential for amenity impacts on residents in close proximity to the ILC included noise, air pollution, hazard spills and a number of traffic and pedestrian issues and mitigation measures to address these were described. Further consideration of impacts during construction and operation will be undertaken during detailed design and mitigation and management measures incorporated into the appropriate construction and operational management plans.	832	Strathfield Council **DoP Submission No121 &159**
amenity/quality of life	Light trespass and sky glow produced by artificial lighting are serious matters which have well known adverse effects upon the natural environment and also upon human health. Apart from sleep disturbance in humans, there is also emerging evidence that night time lighting may play a role in the increased incidence of negative health effects. Reference should be made to Australian standards such as AS 4282-1997, Control of the obtrusive effects of outdoor lighting. It would also be reasonable to expect that the Department will request computer modelling of any proposed lighting installation. Heavy goods vehicles will seriously impact on residential areas on a regional basis, including pollution, noise, vibration, traffic delays, pavement deterioration, road safety issues just to mention a few. The local community have expressed justifiable concerns regarding traffic congestion, noise, and heavy vehicles on local roads in residential areas, increased traffic accidents all conducive to increased truck movements daily. Local community members raised concerns regarding the actual or perceived traffic increases on local roads and the associated safety, noise and air quality impacts from such traffic movements	Light spill has been modelled from a series of points correlating to the closest residences. This indicated that the proposed lighting would be successfully contained within the site. The light levels at the nearest residential development would be virtually imperceptible to people in those areas. The light fittings will be visible from most of the key viewpoints identified within the visual assessment. However, these would not be expected to change the night landscape as the lights would be focused downwards and would be part of a landscape already containing a large number of light sources. Lighting on site would be designed to meet AS4282 Control of Obtrusive Effects. Consultation will be undertaken with rail corridor owners regarding their lighting requirements to ensure the proposed lighting on the site does not significantly affect adjacent rail operations. Screen planting will also be strategically placed to prevent light spill. These issues have been addressed as part of the EA. Impacts on a regional basis will be negligible due to the limited numbers of trucks generated by the proposal in the context of the regional road network performance. The marginal increase in traffic volumes on roads surrounding the ILC site would be small (less than 1%). The actual increase in traffic volumes associated with the ILC has been documented in Chapter 7 of the Environmental Assessment. This is approximately 1% of the total traffic volume.	832	Strathfield Council **DoP Submission No 121 &159**

Issue Category	Comments	Response	Stakeholder ID	Name
amenity/quality of life	There is major concern that the increased operation of the freight line will result in a significant deterioration of amenity for residents living nearby arising from this proposal and the Government's freight strategy. This proposal will contribute to potential noise impacts The findings of the EA are that the operation of the site without mitigation measures would result in the NSW DEC Industrial Noise Criteria, and Sleep Intrusiveness Criteria levels being exceeded. Even with mitigation measures in place (it is proposed to erect sound barriers), maximum noise levels may still be exceeded when wind conditions are adverse. This is an unsatisfactory situation of which the EA concludes there are no further solutions available to further mitigate noise.	Social issues such as amenity were addressed in Chapter 17 of the EA. The effects on amenity for residents will be limited, with potential impacts able to be managed by appropriate mitigation measures. These will be better defined during the detailed design processes and implemented during construction and operation of the ILC. Operational scenarios were carefully considered to ensure they represented the site operating at full capacity. Predicted impacts are considered worst-case, as they assume all activities are occurring at once, which may not occur in reality. Further development of mitigation measures and the modelling of these have been undertaken to ensure the criteria will be able to be met.	816	Canterbury Council **DoP Submission Nos 157 & 162**
amenity/quality of life	Council considers that a more detailed investigation of these matters should be undertaken. Most importantly, if the proposal is to be approved then there needs to be careful thought given to the mitigation measures that will be needed to ensure that the proposal can operate without undue impacts on the residents of Greenacre. Should further information on the management of impacts be obtained, then any effective mitigation measures should be included in conditions of approval, and the facility subject to on going monitoring of the environmental impacts and the efficacy of the mitigation measures.	Environmental Management plans for construction and operation would be prepared. These will identify and implement further mitigation measures to manage impacts associated with the construction and operation of the site.	815	Bankstown Council **DoP Submission No 164 & 328**

Issue Category	Comments	Response	Stakeholder ID	Name
approval processes	Strathfield Municipal Council would like to be made aware of any submission that Sydney Ports Corporation makes in response to the issues raised in the submissions to the Director- General or if the Sydney Ports Corporation were to submit a preferred project report outlining the changes to the project or revised statement of commitments (under s75H(6) of the EP&A Act). We seek to be fully informed of any changes to the proposed project that is made after the public exhibition period irrespective of their significance as it we believe it impacts or is likely to impact in our local government area.	Noted. The Preferred Project Report and responses to issues raised will be provided by SPC to the Department of Planning. Noted. The PPR will include any proposed changes to the ILC proposal.	832	Strathfield Council **DoP Submission Nos 121 & 159**

Issue Category	Comments	Response	Stakeholder ID	Name
Community and Ecological Area	The ecological area provides an opportunity to provide secure habitat for the species if it is appropriately designed and linked into a network of habitat in Greenacre. The target carrying capacity of the Ecological area needs to be coordinated and established. The proposed Community + Ecological Area is a worthwhile concept and should be vested in Council ownership as Community land so it may be open to the general public with the exception of ecologically sensitive areas. The land should be protected with appropriate caveats on title and open space and environmental protection land zonings. A detailed Landscape design of the Proposed Community + Ecological Area needs to be completed with input from Council. The costs for maintenance of this area should be levied from Enfield ILC. Street Trees on Cosgrove Rd should be retained and enhanced as suggested in the strategy. Further Screen Planting with locally indigenous plants should be provided along Wentworth Rd North. Considering the size and impact of this proposed development it is requested that the following contributions be made to the local community: ▪ the ownership of the proposed Community/Ecological Area is handed over to Council; and ▪ Sydney Ports contribute to the full cost of the ongoing maintenance of this facility.	The Frog Habitat Area will be constructed according to the detailed design prepared, which would take into consideration the carrying capacity. This area would be managed according to an appropriate Frog Management Plan. Monitoring of the Frog Habitat Area will be undertaken to ensure it is functioning as designed. SPC will consult DEC and Strathfield Council over the management of the Frog Habitat Area. Opportunities for future ownership, land use zoning and management will be determined at a later date. Landscape design and species planting would be prepared as part of the detailed design process. Species selected for the site would be endemic to the area and sourced from local provenance. SPC will consult Strathfield Council during the preparation of the detailed Landscape Plan. The concept landscape plan includes for landscape treatment of the Cosgrove Road frontage. SPC will consult with Strathfield Council regarding ownership and maintenance of the Community and Ecological Area.	832	Strathfield Council **DoP Submission Nos 121 &159**
Community and Ecological Area	The ecological area provides an opportunity to provide secure habitat for the species if it is appropriately designed and integrated into a network of habitat in Greenacre. However not enough detail has been provided regarding the size and design of the habitat and on the position, size and adequacy of corridor linkages.	Detailed design of the frog habitat area would be undertaken as part of the detailed design phase with input from frog specialists and landscape architects. The plans would allow integration into the Greenacre habitat network, the new Enfield Marshalling Yards frog pond area and Juno parade site. The corridors would be 5-10m wide and constructed with a central depression and groupings of rocks to encourage the collection of	832	Strathfield Council **DoP Submission No 121 & 159**

Issue Category	Comments	Response	Stakeholder ID	Name
		rainwater and formation of small temporary pools. The provision of frog ramps in and out of Coxs Creek may also be provided to assist win the migration of frogs up and down stream.		
	Bell frogs have been sighted by Council staff and local residents as far away from the site as Elliot Reserve and Clement St in South Strathfield. It is presumed that these frogs have dispersed via the Enfield Marshalling Yards. Such corridor linkages will be important to ensure the population does not become isolated and increasingly vulnerable.	See above comment.		
	A detailed Landscape design of the Proposed Community + Ecological Area needs to be completed utilising Safer by Design Principles with Input from Council taking into consideration compatible recreation uses. The costs for maintenance of this area should be levied from Enfield ILC. Prior to earthworks a phase 1 contamination report should be completed.	A detailed landscape plan for the community and ecological area would be prepared as part of the detailed design phase. Exotic species would be removed and replaced with locally occurring species. The focus being on providing habitat for local native species. Consultation will be undertaken with council during design.		
	The proposed Community & Ecological Area, Street Trees and screen plantings are considered worthwhile concepts, however the proposal lacks detail and could be improved for community benefit, Council proposes the following amendments: -	To be developed as part of the detailed design phase.		
	• Community + Ecological Area should be vested in Council ownership as Community Land (under section 26 of the Local Government Act 1993) upon completion of the reserve. The reserve should be open to the public, with the exception of ecologically sensitive areas such as the frog habitat area. This includes the tarpaulin shed.	SPC will consult with Strathfield Council regarding ownership and maintenance of the Community and Ecological Area.		
	As a contribution to the local community it is requested that the ownership of the proposed Community/Ecological Area be handed over to Council and Sydney Ports contribute to the full cost of the ongoing maintenance of this facility, as is outlined in the section on 'Community/Ecological Area and Street Trees'. Ongoing future management, ownership and maintenance of the habitat area needs to be determined via management plans, funding, covenants or agreements. An appropriate land use planning mechanism should	SPC will consult with Strathfield Council regarding ownership and maintenance of the Community and Ecological Area.		

Issue Category	Comments	Response	Stakeholder ID	Name
	ensure that the ecological area cannot be developed. If approval is granted for the Enfield Intermodal Proposal, the following conditions should apply: • Source baseline information on the size of the Enfield Green and Golden Bell Frog population • Determine the goals/targets in partnership with the DEC and Strathfield Council for the Green and Golden Bell-frog and the required carrying capacity of provided habitat in consultation with the Department of Environment and Conservation and Strathfield Council. • Provide detail regarding the size and design of Green and Golden Bell-frog habitat and on the position, size and adequacy of corridor linkages • An appropriate land use planning mechanism should ensure that the ecological area cannot be developed. • Ongoing future management, ownership and maintenance of the habitat area needs to be determined via management plans, funding, covenants or agreements • Indigenous landscape plantings should be of local provenance to protect the integrity of neighbouring remnant bushland, in line with Flora bank guidelines. • There are significant quantities of noxious and environmental weeds on site. Removal will need to take into account protection of Green and Golden Bell frogs particularly if herbicides are employed on site.	A Frog Management Plan is to be prepared by a suitably qualified ecologist and this will provide guidelines for the design of the area. Landscape design and species planting would be prepared as part of the detailed design process. Species selected for the site would be endemic to the area and sourced from local provenance A Landscape Management Plan would be prepared for the construction phase which will include a program of weed removal and revegetation with native species. The risk of herbicide use on GGBF would be considered during preparation of the management plan. Weeds would be removed in accordance with NSW Department of Primary Industries weed control guidelines		

Submissions Council: CONSULTATION PROCESS

Issue Category	Comments	Response	Stakeholder ID	Name
Consultation Process	Consultation with local bus providers and State Transit Authority is deemed necessary to provide additional public transport services to the area to cater for the increased demand. There is also a requirement for existing bus stops to be upgraded and the installation of new bus stops with appropriate signage and markings as per RTA regulations	Further consultation would be undertaken during preparation of the Local Area Traffic Management Plan. The upgrade of existing bus stops and the provision of new bus stops is a matter for relevant State Government agencies.	832	Strathfield Council **DoP Submission No 121**
Consultation Process	While it is noted that the applicant proposes to letterbox 11,000 residents in the area around the site with a newsletter about the proposal (which will also be available at Councils) and also will make information available through a website, there is no way of knowing how much of the specific consultation criteria we specified will be fulfilled. While the minimum requirements for exhibition is met by having a 41 day exhibition period, half of this period was within the Christmas School Holiday period when many people are away. For such a major project the choice of time to exhibit the EA is poor and does not enhance the credibility of the consultation process. Given the technical nature of the information in the EA this period of time is also far too short to make a proper assessment of many aspects of the proposal, as well as allowing lead time to report to and fit in with Council meeting times and deadlines.	The consultation requirements of the Department of Planning (as specified in the EA requirements) were met. The exhibition period was decided and controlled by the Department of Planning. It lasted from 9 January to 20 February 2006, taking into account the holiday period, and accordingly was longer than the statutory period required under the Environmental Planning and Assessment Regulation.	816	Canterbury Council **DoP Submission Nos 157 & 162**
Consultation Process	Council's review of the environmental aspects of the proposal are included in the following section of this submission. However, before dealing with these issues, it is necessary to place on record Councils concerns about the degree of consultation between Sydney Ports and Council during the preparation of this EAR. We consider that Sydney Ports level of consultation with Council has been disappointing for a proposal of this significance and magnitude. Other than participation in a Traffic Working Group with Sydney Ports, the RTA and Strathfield Council, we were not adequately consulted before the EAR was lodged. Bankstown Council had requested consultation as part of the preparation of the EAR to ensure that any concerns that we may have about the proposal's impacts on residents of Bankstown could be addressed in the preparation of the EAR - not after it has been lodged. We had made this request clear in a letter to Sydney Ports and to the Minister for Ports that explicitly requested a Briefing before the EAR was lodged	Noted. Community consultation process involved 1800 number, email, fax and address for any contact and questions throughout EA development process. A regularly updated web site also provided information about the project, the development process and the way by which the community could have its say. Two community days were held - one in May 2005 to outline process of assessment and seek views from residents and groups, and a second in February 2006 during the exhibition of the EA. Council briefings were held for Strathfield, Bankstown, Canterbury, Burwood and Marrickville at the beginning of the process and during the exhibition of the EA. Briefings were offered to a number of community groups. These were accepted by NOPE and the South West Environment Centre. Three newsletters were widely distributed in the area, by direct mail distribution to about 11,000 households, via Councils and mailed to a database of business owners, community groups ands residents. The newsletters were distributed in March	815	Bankstown Council **DoP Submission Nos 164 & 328**

	COMMENTS FROM LETTERS IN 2005 Whilst Council has been consulted about potential traffic impacts through a traffic sub-Committee that has been established, I must advise you that Council does expect further consultation about the entire proposal before we would feel that the Director General's requirement for consultation has been satisfied. We are therefore requesting a briefing prior to lodging any documents	and June 2005 and in January 2006. The exhibition period was decided and controlled by the Department of Planning. It lasted from 9 January to 20 February 2006, taking into account the holiday period, and accordingly was longer than the statutory period required under the Environmental Planning and Assessment Regulation. Sydney Ports will continue to consult with the community during construction and operation of the ILC, should it be approved. It will provide for Community Liaison Groups throughout the construction and operation of the ILC, as part of this continued consultative process.		

Submissions Council: contamination

Issue Category	Comments	Response	Stakeholder ID	Name
contamination	A Remediation Action Plan (RAP) is required prior to remediation work commencing. This would be prepared in accordance with DEC guidelines, SEPP 55 and the Contaminated Land Management Act 1997. This RAP should include provisions for inspection and validation of soils beneath existing structures when they are removed and any hotspots that are uncovered during site development works. Following remediation, all exposed surfaces are to be validated to ensure that all TPH, asbestos and heavy metal contamination has been removed. Further investigations are required to determine the significance and extent of contamination in certain areas including the area west of Stockpile 4 in regards to elevated concentrations of arsenic that exceed the Open Space criteria, and the DELEC site in regards to TPH and copper concentrations.	A RAP is to be prepared and identified contamination to be remediated prior to earthworks commencing. Soils from beneath removed buildings would be visually inspected and testing undertaken if evidence of contamination is present or if the soils are observed to be different from the surrounding area. Validation testing of remediated hotspots and all exposed surfaces is to be undertaken to ensure contaminant levels are below threshold levels defined within the RAP. Further investigations are to be undertaken into the contamination hotspot (Arsenic-As) within the proposed Community and Ecological area to determine the significance and extent of the elevated levels prior to assessing remediation options. The copper and TPH hotspots identified in the DELEC area are to be remediated through excavation and disposal (Copper) and landfarming (TPH).	832	Strathfield Council **DoP Submission No ‘s 121 &159**
contamination	No mention has been made to the threat of contamination to the population of Green and Golden Bell Frog, which is a threatened species under the Threatened Species Conservation Act 1995. Of particular concern is the arsenic concentration to the west of Stockpile 4 within the Community and Ecological Area. The statement that the required remediation work will be Category 2 under the provisions of SEPP 55 may be incorrect if this contaminant is likely to have a significant effect on this threatened species according to Clause 9 (c). It appears as though the contamination assessment has been carried out without mention of the toxicity of contaminants to the population of Green and Golden Bell Frog, which is classified as a threatened species. Of particular concern is the arsenic concentration to the west of Stockpile 4 within the Community and Ecological Area. Whilst the criteria for risk to the environment and human health has been discussed no mention has been made of what threat the concentrations found are to the frogs, which are generally considered as sensitive due to the nature of their skin.This fact is interesting to note because one of the triggers for Category 1 remediation under SEPP 55 is a likely significant effect on a threatened species. The Site Contamination Assessment has not considered the risk presented by contamination in the Community and Ecological Area on the population of Green and Golden Bell Frog, which is a threatened species. ▪ Further investigations to determine the significance and extent of contamination is	Further investigations are to be undertaken into the contamination hotspot (As) within the proposed Community and Ecological area to determine the significance and extent of the elevated levels. A risk assessment would be undertaken to determine the threat to sensitive receptors including the GGBF. This information would be used to assess remediation options, if required. See above comment. It is not considered that the remediation would have a significant effect on the GGBF. It will improve the quality of the habitat. See above comments.	832	Strathfield Council **DoP Submission Nos121 & 159**

Issue Category	Comments	Response	Stakeholder ID	Name
	necessary in certain areas including: ▪ the area west of Stockpile 4 in regards to elevated concentrations of arsenic that exceed the Open Space criteria; and ▪ the DELEC site in regards to TPH and copper concentrations. Phase 1 Testing of site including landfill in existing mound and current containment methods to determine suitability for recreation and whether further decontamination /containment methods are required. Proposed new / increased mounding should utilise virgin fill.	The studies already done for the project have addressed the contamination levels in the stockpiles. Validation testing of all remediated areas and any final exposed soil surfaces will be conducted in accordance with DEC guidelines, to ensure removal of contamination to levels defined within the RAP. All imported fill is to carry a validation certificate.		
contamination	The riverbed of the Cooks River contains elevated levels of some metals (certainly above water quality guidelines). The EA indicates that the site is currently contributing heavy metals (particularly lead and zinc) to Coxs Creek (a tributary of the Cooks River). The proposed water quality treatment proposed would only result in a minor decrease in the lead, copper and zinc currently entering Coxs Creek. It is considered the EA should investigate options for water quality treatment that would deliver a greater reduction in the heavy metal load that the site is currently contributing.	The proposed development will not contribute to increased levels of metals in the Cooks River. The water quality devices proposed will contribute to an overall improvement in water quality entering Coxs Creek. Stormwater runoff and management were addressed in the EA in Chapter 10 and would be further considered as part of detailed design.	816	Canterbury Council **DoP Submission Nos 157 & 162**

Issue Category	Comments	Response	Stakeholder ID	Name
Design	The Visual Impact of the proposal has not been adequately addressed and mitigated. The visual impact of tall stacks of shipping container, site infrastructure, warehouses and the road bridge will be visible from many adjacent and nearby publicly accessible roadways, overpasses and residential areas.	Views from key viewpoints around the site were considered as part of the EA. Visual screening will be provided through planting, noise attenuation mounds and treatment of Cosgrove Road frontages.	832	Strathfield Council **DoP Submission Nos 121 & 159**
	Additional site perimeter landscape screen/buffer planting is required to mitigate this detrimental visual impact.	See above comment. Noise mounds surrounding the site will be planted with local species selected for their screening properties where required.		
	If approval is granted for the Enfield Intermodal Proposal, the following conditions related to the disposal of stormwater runoff and stormwater management, should be applied: 1. A detailed drainage study and report is to be prepared by a suitably qualified hydraulics engineer, demonstrating that the development has no adverse effects on adjoining properties as a result of flooding and stormwater runoff and that there is adequate protection for buildings against the ingress of surface runoff. In addition the report required in above should demonstrate that the site discharge does not exceed predevelopment flows. Storms for 2, 10, 20 and 100 years, ARI shall be assessed to determine the critical storms and peak discharges for the pre and post development conditions. Details shall be submitted to and accepted by Council's Manager Engineering & Works Services prior to the issue of a Construction Certificate.	Stormwater runoff and management were addressed in the EA in Chapter 10 and Appendix D. More detailed hydraulic studies will be undertaken as part of the detailed design. The basic principle that the development shall have no external impacts for the accepted ARI events will be applied.		
	2. In areas where flooding problems have occurred (e.g. Wentworth Street at the Mayvic Street), or there is a risk of such occurrence, separate flood study or drainage analysis of the catchment shall be carried out by the applicant's consultant. Also catchment analysis shall be carried out for each conduit that traverses the site, in accordance with the current practices and principles outlined in "Australian Rainfall & Runoff'. Hydraulic grade line calculations are required for any pipe systems where flows are in excess of 100 l/s. Details shall be submitted for approval of Council's Manager Engineering & Works Services prior to the issue of a Construction Certificate.	The ILC site will not provide a solution for existing stormwater problems external to the site, nor will they be studied in any detail. However, the basic principle outlined above will be applied.		
	3. On-site stormwater detention storage shall be provided in conjunction with the stormwater disposal system. The storage system shall be designed in accordance with Council's Stormwater Management Code. Details of the storage system shall be submitted to and approved by Council prior to the issue of a Construction Certificate.	Noted.		
	4. Stormwater runoff from each sub-catchment area shall be collected and discharged to the existing downstream drainage conduit via the On-site Stormwater Storage.	Due to the nature of the site and the capacity of existing external stormwater systems, the most appropriate solution is to construct a large stormwater detention		

	Diversion of flows to southern end of the site and discharge of stormwater runoff to Cox's Creek, which is already under capacity, is not acceptable.	network at the southern end near Coxs Creek. This will be designed to ensure predevelopment discharges are not exceeded for normal ARI criteria.		
	5. The existing and proposed drainage conduits and pipe systems draining the upstream catchment and the development site should comply with an ARI standard shown in the table below, with suitable treatment of all surface flows to 1 in 100 year ARI standard. Where surface flow paths are not available, the pipe standard should rise to 100 yr ARI. Pipe System - ARI Standards Residential 20 yrs Commercial / Industrial 50 yrs OSD range 2 to 100 yr	Due to the area and nature of the site, the size of the culvert required to pipe up to the 100 yr ARI is impracticable. It is proposed that up to the 10 year ARI be piped and up to the 100 yr ARI be provided with an overland flow path with no runoff outside the site.		
	6. The loss of 10,000m3 flood storage as a result of the proposed development, stated in SKM report is not acceptable. The applicant must demonstrate that the proposed cut and fill mentioned in consultants report does not have adverse impact on the overland flow path.	Noted.		
	7. Surface runoff from upstream properties is to be catered for, obstructions that cause darning and backwater effects on the upstream properties are not permitted. Adequate surface flow paths shall be provided to convey all flows to the 1 in 100 year standard.	See comments above.		
	8. Open drainage system components are to be designed to meet relevant safety criteria. Storage basins are to have battered slopes for egress, maximum ponding depths, and appropriate signage and fencing. The possibility of failure of components of the system must be considered, and provision shall be made for the safe conveyance of flows should failure occur.	Noted.		
	9. Drainage easements in favour of relevant owners shall be created over the existing drainage line located within the development site for the purpose of constructing and maintaining stormwater drainage structures. The easement width shall be the pipe diameter plus 1.0m with a minimum width of 2.4m Council shall approve the wording of the dedication prior to lodgement at Land & Property Information NSW.	This matter will need to be assessed. It is unlikely that SPC will agree to new easements that affect the development.		
	10. The footings shall be located clear of the easement and designed by a practising structural engineer (holding membership with Engineers Australia). Details are to be submitted to and approved by Council's Manager Engineering Works & Services prior to the issue of a Construction Certificate.	See note above.		
	15. No buildings and structures are permitted over drainage lines or within easements and overland flow paths. Clearances to easement boundaries are required to prevent structural loads on drainage structures or encroachment within the	Overland flow paths will be designed to take account of the location of proposed buildings. The ILC design will take account of loads on existing drainage structures and mitigating measures will be taken where necessary.		

	angle of repose of the soil.			
	11. The proposed drainage lines connecting to Council's or Sydney Water's drainage system shall be constructed prior to commencement of works on site in accordance with Council's and Sydney Water's requirements.	The drainage system cannot be constructed until existing significant mounds of earth are redistributed around the site to achieve design levels. Sedimentation ponds will be constructed early in the development works to deal with site runoff.		
	The utility services within the area of effect of the proposed drainage works (i.e. gas, water, sewer, electricity, telephone, etc) shall be physically located and the applicant's contractor shall confirm the minimum clearance between the utility service and the drainage pipe with the relevant authorities prior to the commencement of drainage works on site.	Noted		
	Electricity and telecommunication cabling shall be "placed underground at the applicant's expense from the development site to the main power lines and telecommunication cables in accordance with the specifications of Energy Australia and telecommunications suppliers.	Noted		
	The following work must be carried out: (a) Where the property is located on the opposite side of the street to the main power lines and telecommunication cables, the house services are to be placed underground from the development site to the nearest location on the opposite side of the street for connection to the existing mains supply as directed by Energy Australia and the telecommunications carrier. The method of construction across the road carriageway shall be by directional boring beneath the road pavement; or, (b) Where the property is located on the same side of the street as the main overhead power lines and telecommunication cables, all services are to be placed underground across the full width of the frontage of the site. Any overhead power lines and telecommunication cables that cross the road from the development site must also be placed underground and the cabling installed and distributed to properties in accordance with the Supplier's and Carrier's requirements. 29. Prior to the issue of a Construction Certificate the applicant must contact: (a) The Engineer Planning and Supply Negotiations (West) Energy Australia on 131 535, to obtain a quotation to underground power supply lines and where appropriate a quotation to underground the main overhead power supply lines adjacent to the frontage of the subject property.	Utilities assessment undertaken as part of the EA in Chapter 4 and Appendix L. More detailed studies will be undertaken as part of the detailed design.		
	An easement shall be created in favour of electrical and telecommunications suppliers and comply with the following: (a) For the provision of underground services and above	Noted		

	ground pillar boxes for access to their equipment; (b) The easement is to be 3m wide abutting the property boundary at the point of entry and 1.5m within the property; (c) Where the easement is to be enclosed, a minimum headroom of 2m is required above the floor level; and (d) The wording of the easement shall be approved by Energy Australia and the Telecommunications Carrier where applicable, prior to the issue of a Construction Certificate. (e) Written evidence that the wording of the easement has been approved by the relevant service providers shall be provided to Council prior to the issue of a Construction Certificate. (f) The required easement shall be created and registered prior to the issue of an Occupation Certificate or use of the building. - Ragbolt mounted network standard metal columns fitted with MBF 80 lamps shall be installed 1metre behind the face of the kerb with a 2 metre outreach arm. - Street lighting must comply to the Australian Standard for pedestrian area lighting, 1158.3.1 'Performance and installation design requirements' and be consistent with the requirements of Energy Australia. - Any disturbance to footpaths as a result of the undergrounding of services shall be restored at no cost to Council. A Works Permit from Council's Customer Service Centre must be obtained prior to undertaking the work. - A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained for the proposed development. Application must be made through an authorised Water Servicing Coordinator - creation of drainage easements on the title in favour of relevant authorities; - road and stormwater drainage works in roadways and public areas; - creation of the Positive Covenant on the property title; - connection to Council's stormwater drainage system; - installation and maintenance of sediment control measures for the duration of construction activities; - construction of the on-site detention storage system; - provision for overland flow of stormwater runoff through the site, - undergrounding of electricity and telecommunications cables; - upgrading of drainage conduits within the development site. It is noted that Council's Development Assessment & Environmental Sections shall comment on rainwater tank requirements. Detail Master Planning - The 'Concept Plan - Master Plan' (Figure?) and the other information provided in the plans and reports does not indicate an adequate level of: a) urban design detail; b) landscape and planting detail; c) landscape screen/buffer site perimeter planting; c) street tree planting to all internal roads; d) sufficient landscaping	A detailed landscape master plan will be prepared as part of the detailed design of the site.		

	for the amenity of site; e) on site vehicular carparking; 0 additional potential screen and tree planting opportunities (including additional street tree planting) outside the site that could mitigate impacts of the proposal eg beside Roberts Road, Wentworth Road and Cosgrove Road etc. On Site Car-Parks - Vehicular carparking has not been indicated for private or company cars with the site. Shade tree and screen planting should be indicated to Carpark areas in accordance with the requirements of Councils Development Control Plan No. 27 - Industrial development. Carpark requirements include shade tree planting (every 8 carspaces) and screen planting. It will potentially be necessary to create a carpark within this compound area relating to the function of the buildings and vehicle and pedestrian access into this area. Landscape design and plant selection to match the Architectural period should be used to enhance the context and integrity of the heritage buildings, increase the amenity for staff using the buildings and to screen/soften the impact of the surrounding site operations. Light Industrial/Commercial Development Landscape screen/buffer planting has not been indicated between the proposed Light Industrial Development and Cosgrove Road (other than Street tree planting to Cosgrove Road). Sydney Port's representatives have previously stated that the light industrial area development along Cosgrove Road would be planned in accordance with Councils Development Control Plan No. 27 - Industrial Development (DCP 27). DCP 27 indicates the specific landscaping requirements that should be provided including the specific details and depth of front setback and screen planting and the carpark shade tree planting. Perimeter Screen Planting - Improve the extent, depth and height of the screen/buffer planting to the perimeter of the site to screen the visual impact of the site from the surrounding public roads and residential areas. This includes screening the: container storage areas (potential 16 metre high stacks consisting of unsightly vividly coloured and rusty containers), Gantry Cranes and also the large buildings such as Warehouses. This screen planting is to include: a) extending the planting to the full perimeter of the site including the full extent of the western boundary of the site (eg to the western side of the dedicated rail siding to the 'Intermodal Terminal Site' and to the western side of the two 'Empty Container Storage Areas') and to the eastern side of 'Warehouse F'; b) increasing the width and planting quantity and height (through mounding and/or tree species selection) to all perimeter screen/buffer planting areas; c) mass planting the northern most corner of the site to	The concept design as provided in the EA is to be expanded during the detailed design phase. This will include details for landscape planting and for on-site parking. On-site parking will be provided for all employees. This would be provided as part of the detailed design, which would be prepared in accordance with the EA and any relevant DCPs. Landscape and plant selection would be designed as far as practicable to be consistent with the requirements of DCP27. DCPs would be considered in developing the landscape design plans.		

	minimise the visual impact as seen from the Roberts Road overpass and from Liverpool Road.			
	Detail Master Planning - Detail Master Planning is required for all areas of the site indicating: a) full urban design and landscape design of the site; b) detail planting schemes of all landscape areas including, plant locations, plant species, container sizes, quantities etc; c) perimeter landscape screen/buffer planting to the full extent of the site; d) mass planting the northern most corner of the site; e) street tree planting to all internal roads; f) increase landscaping within the site (eg surrounding buildings) to improve amenity; g) vehicular carparking is to be indicated with shade tree planting (every 8 carspaces) and screen planting to edges; h) additional screen and tree planting (including opportunities for additional street tree planting) outside the site that could mitigate impacts of the proposal eg beside Roberts Road, Wentworth Road and Cosgrove Road etc	Visual screening and habitat provision would be the primary considerations when preparing the landscape design plan. These comments would be taken into consideration when developing the detailed landscape plan. Local species proposed for acoustic mounds.		
	Light Industrial/Commercial Development The landscape requirements for the proposed Light Industrial/Commercial Development adjacent to Cosgrove Road should be planned in accordance with the requirements of Councils Development Control Plan No. 27 - Industrial Development (DCP 27) eg. screen planting, landscape amenity planting and Car-Park planting should be indicated in accordance with the Landscaping Requirements in DCP 27.	Shrubs and trees proposed for north west corner of site to provide screening To be undertaken as part of the detailed design phase. Design to be undertaken in accordance with all relevant DCPs.		
	The following details are required before any further comments or consideration of the application; • the total number of poles • the total number of luminaires • the angular distribution of light from each luminaire in the orientation to be used in practice, ie is there a cant angle? • the total power consumption of each luminaire and of its ballast • the total luminous flux of each luminaire • the peak and average horizontal illuminance over the site • the total site area • the contribution of individual illuminated building sides to the vertical plane illuminance at the site boundary or other test points • the type of lamp, eg metal halide, HPS? • the application of any lighting curfew as specified in AS 4282-1997 • whether the proposed lighting complies with the 1 lux vertical plane maximum allowed by 4282 at the boundary of environmentally sensitive areas such as the wildlife refuge? • whether vehicle lights will be added to the fixed lighting	To be undertaken as part of the detailed design. On site lighting to be designed to meet AS4282 Lighting requirements of GGBF to be considered during detailed design. To be determined during detailed design		

	in determining visual impact in terms of light spill illuminance and obtrusiveness of intense point light sources viewed from residential areas? • use of any other supplementary lighting, eg for vehicle maintenance at night? • whether internal light within the buildings will escape through doors, windows, loading bays and skylights, and if so how do these sources combine with all others .in increasing light spill, obtrusiveness, total ambient light flux in the area, particularly in respect of the residential parts, including when there is a low overcast? • Possibility of a bike path / BMX track through less sensitive areas of the site. • Provision of interpretive signage and educational information on the site including frog ponds, tarpaulin sheds, previous uses.			
	• Naturalising of Cox's Creek concrete channel or partial naturalisation incorporating the frog ramps. • Pathway design should meet equal access guidelines and path network should meet the guidelines set out in the Cooks River Pathway Improvement Study 2005. • Firebreaks should be provided to surrounding structures to provide protection due to the flammable nature of selected species (native grasses).	Uses for the Community and Ecological Area to be further discussed with SPC and Council. Coxs Creek is managed by Sydney Water and functions as a stormwater drain		
	• Noise Walls should surround the northern and Western boundaries of the Community + Ecological Area.	Noise barriers described in EA do not include the northern and western boundaries of the Community and Ecological Area.		
	Extension of Cycleway from Begnell Field through to Wentworth Rd, Greenacre	SPC is not proposing any offsite bicycle paths.		
	• Proposed walk/cycleway that will link to the Cooks River - Bay to Bay Cycleway at Water St through the existing major open space corridor (identified in Figure & Intermodal Logistics Centre At Enfield - Landscape And Urban Design Report Site Analysis - Ecological And Recreational Connections should bridge across the Enfield ILC & railway site to link the currently isolated residential area in Greenacre composed of: Wentworth St (South); Hebe St; Pomona St; Sylvanus St; Matthews St; Drew St & Webber St.	SPC is not proposing any offsite bicycle paths.		
	• The pedestrian / cycle link would provide scope for extension to the Bankstown area in the future. • Provision should be made to extend this cycleway arm through the site to provide a transport link for the local residents.	SPC is not proposing any on-site bicycle pathways.		
	Intermodal Terminal Area - The Unloading Area including the container stacks (maximum 13 metre high) and 3 Gantry Cranes (assumed to be in excess of 13 metres high), and the Light Towers (25m tall) will be potentially visually significant. Perimeter screen/buffer planting to the western edge of the site and screen planting along the western side of Wentworth Road could minimise this impact.	Views from key viewpoints around the site were considered as part of the EA. Visual screening will be provided through planting, noise attenuation mounds and treatment of Cosgrove Road frontages. Noise mounds surrounding the site will be planted with local species selected for their screening properties where required.		

	Road Bridge - The Road bridge over the Enfield Marshalling yards to Wentworth Road even with the proposed 'simple and unobtrusive' design will be a significant new structure. The frequent usage of the bridge by large trucks hauling vividly coloured shipping containers will greatly contribute to the visual impact of the bridge. Additional planting to the eastern side of Wentworth Road would assist in decreasing the visual impact areas to the west of the site.	See above comment		
design	Whilst Bankstown Council supports the objectives behind the establishment of the facility, we consider that modifications are required on these matters before we are satisfied that the facility will operate in an environmentally acceptable manner.	Noted.	815	Bankstown City Council **DoP Submission No 164 &328**

IssueCategory	Comments	Response	Stakeholder ID	Name
flora and fauna	The Enfield Marshalling Yard site is one of three key properties for the Greenacre population of Green and Golden Bell Frogs, i.e. Enfield Marshalling Yard, 1-7 Juno Pde and Coxs Creek Reserve. These frogs are one population and utilise each individual allotment in Greenacre for the different parts of its life cycle requirements. Development over the last 10 years in Greenacre has seen a major reduction and fragmentation of foraging habitat and movement corridors. The Environmental Assessment states that the Enfield Marshalling Yards contains marginal habitat for Bell - frogs. Although true, each individual lot in Greenacre contains marginal habitat. It is the combination of these sites that provides the total habitat. As such it is not appropriate to consider the site in isolation, but rather as a key component of a series of fragmented habitats that when considered together make up the total habitat. No mention has been made to the threat of contamination to the population of Green and Golden Bell Frog, which is a threatened species under the Threatened Species Conservation Act 1995. Of particular concern is the arsenic concentration to the west of Stockpile 4 within the Community and Ecological Area. The statement that the required remediation work will be Category 2 under the provisions of SEPP 55 may be incorrect if this contaminant is likely to have a significant effect on this threatened species according to Clause 9 (c).	Detailed design of the frog habitat area would be undertaken as part of the detailed design phase with input from frog specialists and landscape architects. The plans would allow integration into the Greenacre habitat network, the new Enfield Marshalling Yards frog pond area and Juno parade site. The corridors would be 5-10m wide and constructed with a central depression and groupings of rocks to encourage the collection of rainwater and formation of small temporary pools. The provision of frog ramps in and out of Coxs Creek may also be provided to assist win the migration of frogs up and down stream. This area would be managed according an appropriate Frog Management Plan. Monitoring of the Frog Habitat Area will be undertaken to ensure it is functioning as designed. Further investigations are to be undertaken into the contamination hotspot (As) within the proposed Community and Ecological area to determine the significance and extent of the elevated levels of the heavy metal previously identified. A risk assessment would be undertaken to determine the threat to sensitive receptors including the GGBF. This information would be used to assess remediation options.	832	Strathfield Council **DoP Submission No 121 & 159**
flora and fauna	The Environmental Assessment states that the site contains marginal habitat for Bell - frogs. Although true, each individual lot in Greenacre contains marginal habitat. It is the combination of these sites that provides the total habitat. As such it is not appropriate to consider the site in isolation, but rather as a key component of a series of fragmented habitats that when considered together make up the total habitat. The Green and Golden Bell-frog recovery plan identifies this population as one of only 8 key populations in Sydney. No baseline information is provided in the EA on the total population of Greenacre Bell Frogs and as such the overall goal or carrying capacity of the Ecological area is unknown. This needs to be coordinated and established between Sydney Ports, the Department of Environment and Conservation and Strathfield Council. Such consideration will assist in determining the balance between habitat and community functions in the ecological/community use area.	Connectivity between frog habitats would be a key consideration when designing the frog habitat area (see comment above). The Frog Habitat Area will be constructed according to the detailed design prepared, which would take into consideration the carrying capacity. This area would be managed according to an appropriate Frog Management Plan. Monitoring of the Frog Habitat Area will be undertaken to ensure it is functioning as designed.	832	Strathfield Council **DoP Submission Nos 121 & 159**

	There are significant quantities of noxious and environmental weeds on site. Removal will need to take into account protection of Green and Golden Bell frogs particularly if herbicides are employed on site.	A Landscape Management Plan would be prepared for the construction phase which will include a program of weed removal and revegetation with native species. The risk of herbicide use on GGBF would be considered during preparation of the management plan. Weeds would be removed in accordance with NSW Department of Primary Industries weed control guidelines		
	All site planting including the site entrance area is to be plant species indigenous to the area of local provenance to: protect the integrity of the neighbouring remnant bushland, maximise the flora and fauna biodiversity and habitats within the site, and reduce water demand. The heritage period planting scheme for the areas surrounding the Heritage Items to be retained should be species selected to match the relevant historic period/s.	Landscape design and species planting would be prepared as part of the detailed design process. Species selected for the site would be endemic to the area and sourced from local provenance. Plants will be installed at sizes that maximise their chances of survival and species selected that will be robust and hardy, requiring relatively low maintenance and watering. The planting will be responsive to the local site conditions such as land-fill areas, excavated cuttings, drainage swales and depressions, wind exposure, soil types and vehicle emissions. Species which match the relevant historic period would be selected where they satisfy the criteria noted above.		
	Planting - All site planting, including the site entrance area, is to be plant species indigenous to the area of local provenance except for heritage period planting scheme for the areas surrounding the Heritage Items to be retained.	See above comment.		
	Street Trees on Cosgrove Rd should be retained and enhanced as suggested in the strategy. Further Screen Planting should be provided along Wentworth Rd North; the use of locally indigenous plants that have been successful along this road, should be considered. The proposed noise walls should feature increase vegetative screening and be covered in tough climbers to prevent graffiti vandalism.	Screen planting is proposed around the site. Indigenous species would be used in plantings. Mounded noise slopes will be planted with native trees, shrubs and groundcovers. The design of the noise walls will be determined during detailed design phase.		
	Use of indigenous trees and plants sourced from local seed from the Cox's Creek	Species selected for the site would be endemic to the area and sourced from local provenance.		
	Noxious Weeds - Noxious Weeds must be eradicated from the site prior to construction to prevent their spread on and off site.	A Landscape Management Plan would be prepared for the construction phase which will include a program of weed removal and revegetation with native species. Weeds would be removed in accordance with NSW Department of Primary Industries weed control guidelines		
	Street Trees - Edge Treatments & Entry Points ▪ Existing street trees along Cosgrove Rd including Tallow wood (Eucalyptus microcorys), ▪ Brushbox (Lophostemons confertus) and Paperbark (Melaleuca quinquenervia) should be ▪ retained. ▪ The re-enforcement of the existing street trees with Brushbox (Lophostemon confertus)	Noted – Any augmentation to the existing street trees will be undertaken in consultation with Strathfield Council.		

	▪ and Paperbark (Melaleuca quinquenervia) as outlined in section 5.4 page 13 Volume 4 Appendix 1 Landscape and Urban Design Visual Assessment is supported by Council. ▪ Details of any street trees requiring removal must be provided to Council. ▪ Driveway crossings should be located a minimum 2 metres distance from any existing street tree. **Screen Planting - Wentworth Road North** Screen Planting should be provided on the nature strip / external boundary of the site along Wentworth Rd North. Suggested species from existing planting in Wentworth Rd should • Grey Box - Eucalyptus moluccana • Coast Myall - Acacia binervia • Blackthorn - Busaria spinosa Street Trees on Cosgrove Rd should be retained and enhanced as suggested in the strategy. Further Screen Planting with locally indigenous plants should be provided along Wentworth Rd North	No street tree removal has been identified at this stage. Council would be advised of any removals required. This will be considered during preparation of the Landscape Management Plan. Noted To be addressed as part of the detailed design phase		
Flora and fauna	Support the recommendation for enhancing habitat for the green and golden bell frog.	Noted.	815	Bankstown City Council **DoP Submission No164 &328**

Issue Category	Comments	Response	Stakeholder ID	Name
Heritage/Archaeology	The former Enfield Marshalling Yards site as a whole is of heritage significance in illustrating the history and former use of the site. A comprehensive development history and historical survey of the site is required before further demolition or relocation occurs. The surviving significant historic built elements which contribute to the historic legibility of the site should be preserved on site. For example the Administration Building and Yard Masters Office should be retained and utilised as part of the site operations and the pillar water tank, gantry crane and pedestrian footbridge should be relocated to contextually appropriate locations within the site. It is feasible to relocate one or both sections of the state significance former Tarpaulin Factory without substantial loss of significance particularly as it is a reassembled building.	Any items of heritage value to be removed or relocated from the site will be archivally recorded. Items are to be preserved or relocated within the site where possible. The proposed site layout does not provide opportunities for retention for the Administration Building and Yard Master's office. Options for reuse of the pillar water tank, gantry crane and pedestrian footbridge are to be explored during the detailed design phase. Management options for the Tarpaulin Shed are to be further developed in consultation with the Heritage Office and the local community.	832	Strathfield Council **DoP Submission Nos 121 & 159**
Heritage/Archaeology	Landscaping to Heritage Buildings - The Administration and Yard Masters buildings are to be retained on site due to their heritage significance (refer to Heritage Section). The retention of these buildings will involve securing the immediate area surrounding the two heritage buildings from the adjacent site operations such as the Intermodal Area to the north and Empty Container Storage to the south. **Landscaping to Heritage Buildings** For the heritage buildings that should be retained on site eg Administration Building and Yard Masters Building, the landscape design and plant selection is to match the Architectural period. This landscaping should be used to enhance the site context and integrity of the heritage buildings, increase the amenity for staff using the buildings and to screen and soften the impact of the adjacent site operations. Possible Demolition of northern section (addition) of the tarpaulin shed (garages) to improve vision and access into Community + Ecological Area. **Demolition of Yard Master's Office -** the removal of the verandahs, chimneys and roof tower (are noted in the GBA report) as having a high impact on the significance of this building. Other alterations including the bricking up of windows and a door to the verandah. While these have had some impact on the significance of the building, removal of such elements is not unusual. All of these elements that could be reconstructed and the original	There is no scope for retention for these items within the proposed site layout. Full archival recording of these items will be undertaken prior to demolition. The landscape plan will be prepared with consideration of the historic context of the site. The planting will be responsive to the local site conditions such as land-fill areas, excavated cuttings, drainage swales and depressions, wind exposure, soil types and vehicle emissions. Species which match the relevant historic period would be selected where they satisfy the criteria noted above. The Tarpaulin Shed has been identified as being of heritage significance and options for reuse are to be investigated as part of the detailed design phase. The Yard Master's office has been assessed as being of local significance due to fabric losses. Full archival recording of this item would be undertaken prior to demolition.	832	Strathfield Council **DoP Submission Nos 121 & 159**

	design of the building again appreciated. The rarity of the building and its importance as a remnant element of the former Enfield Marshalling Yards would make reconstruction of key elements including the roof tower, the verandah and fenestrations a valid project. The GBA report also states that re-use of the building would require a 16m curtilage for protection of the building and that its setting would be diminished by being surrounded by shipping containers and railway lines. The setting of the building when it was operational was amid railway carriages where it was not on "public view". The setting amid shipping containers is to some extent comparable with the setting in a marshalling yard. With a curtilage of 16m, the setting of the building if reused for staff or administrative purposes associated with the proposed logistics centre would be acceptable.			
	The assessment by GBA of the Administration Building considers it to have no heritage significance. The building is of significance. With the adjacent Yard Master's Office it formed the centre of operations for the former marshalling yards. Being constructed shortly after WWII at a time of materials shortages, its construction reflects the high importance of the railway network at that time. As a substantial and representative example of a building of the Post WWII Modernist style and as a large industrial building in the Strathfield Municipality it is rare and does have local significance. While it has had some alterations for air conditioning equipment, it is substantially intact. The Assessment of Heritage Impact does not appear to adequately investigate options for re-use of this building. With the adjacent Yard Master's Office, it might be used for administrative and/or staff purposes. Options for reuse of the building with access via the relocated pedestrian footbridge should be properly investigated. With the buffer precinct, a zone could be created that provided an appropriate setting for both the former Yard Master's Office and the administration building.	The Administration building has been identified as having no heritage significance. The building will be removed from the site.		
	It is agreed that re-use of the tank is not probable in the context of the proposed Intermodal logistics centre. The option of relocation appears to be the most feasible option. Stabilisation and relocation of the tank should be within the site and an appropriate location should be found within the proposed development.	Opportunities for restoration and relocation of the water tank within the proposed ILC site would be investigated as part of the detailed design phase. Archival recording in accordance with Heritage Office guidelines would be undertaken prior to relocation.		
	There may be potential to reuse the footbridge in the proposed logistic centre by relocating it and raising the height of the bridge to a similar level to the new proposed roadway across the site. Use of concrete stanchions below the steel frame should be investigated to allow this to be achieved. This would be preferred to relocation of the structure to another site.	Options for reuse of part or all of the footbridge within the Community and Ecological area would be investigated as part of the detailed design phase. If no reuse options are identified it would be offered to an external heritage organisation. Archival recording in accordance with Heritage Office guidelines would be undertaken prior to relocation.		

	Potential Loss of Remaining Evidence of Railway Lines - The extent of surviving railway tracks does not appear to be adequately accessed. As items that have presumably been in the ground for more than 50 years, these could be considered to be archaeological relics and, under the NSW Heritage Act, an archaeological permit is required to disturb these unless an exemption permit is granted. The railway tracks would provide good evidence of the layout of the yard at the end of the period of use of the site as a marshalling yard. This, compiled with aerial photographs and early site plans, could allow a better recording of the history of this site.	The majority or railway lines previously present on site have been removed. A permit is not required as the project is exempt from such approvals as it is a Major Project assessed under part 3A of the EP&A Act. A heritage interpretation plan and strategy will be prepared for the site prior to construction works beginning. This will include a recording of the history of the site.		
	DELEC Centre - This building including the wheel lathe has been assessed as having no heritage significance as an individual building. This assessment is agreed with. The former Administration building and Signal Box should be retained and incorporated into the proposed development.	See comments regarding Administration Building. The Signal Box is no longer present on site (demolished circa 1998).		
	The pedestrian footway should be incorporated into the proposed development. This could be relocated and, if necessary, raised to a higher level on new concrete stanchions. An archival recording of the structure in its present location in accordance with NSW Heritage Office Guidelines How to Prepare Archival Records of Heritage Items should be made prior to any relocation.	Options for reuse of part or all of the footbridge within the Community and Ecological area would be investigated as part of the detailed design phase. If no reuse options are identified it would be offered to an external heritage organisation. Archival recording in accordance with Heritage Office guidelines would be undertaken prior to relocation.		
	The transshipment shed and gantry crane should be archivally recorded in accordance with NSW Heritage Office Guidelines How to Prepare Archival Records of Heritage Items prior to removal from the site. If possible, the gantry crane should be relocated to a site for display and interpretation of railway heritage.	Due to extensive termite damage in the wagon repair shed (transhipment shed) very few elements are fit for reuse. However, some items of this may be able to be reused as amenities on site. The structure will be recorded in accordance with Heritage Office guidelines prior to removal/relocation.		
	The pillar water tank should be relocated within the site.	Options for reuse of the pillar water tank as a landscape element on the ILC site are to be explored during the detailed design phase.		
	Priority should be given to compiling a history of the site that focuses on its use as a marshalling yard. Such a history should include: • Correlating any known photographic and documentary evidence of the use of the site. • Compiling recordings of buildings and significant elements already demolished such as signal boxes. • Archival recordings of significant elements that remain on the site at the present day • Recording of arrangements of the railway track network on the site, including platforms for loading and maintenance purposes. This could be based on aerial photographs and/or plans provided by State Rail (or other railway branches). This should be undertaken prior to the demolition or relocation of any of the significant elements	An interpretation plan and strategy for the whole of the site will be prepared. Archival records would be prepared prior to demolition / relocation of heritage items on site.		

	on the site. A copy of the history should be lodged with: . NSW Heritage Office • Strathfield Municipal Council Local Studies Library • NSW Rail Transport Museum • State Rail Heritage Division • Royal Australian Historical Society Prior to any further demolition or relocation of significant elements of the site, a history of the development of the site should be compiled to allow future interpretation of the place and its importance in the NSW railway network. This history should include the following: • Correlating any known photographic and documentary evidence of the use of the site. • Compiling recordings of buildings and significant elements already demolished such as signal boxes. • Archival recordings of significant elements that remain on the site at the present day • Recording of arrangements of the railway track network on the site, including platforms for loading and maintenance purposes. This could be based on aerial photographs and/or plans provided by State Rail (or other railway branches).	See comment above		

Issue Category	Comments	Response	Stakeholder ID	Name
Hydrology	Downstream of the site, residents in Cosgrove Road at Coxs Creek report inundation of their properties in significant rainfall events. Sydney Water also indicated that there are known flooding problems at Water Street, where Coxs Creek meets the Cooks River	The ILC site will not provide a solution for existing stormwater problems external to the site, nor will they be studied in any detail. However, the basic principle that the development shall have no external impacts for the accepted ARI events will be applied. Flooding issues would be considered during preparation of hydrological and drainage plans as part of the detailed design phase.	832	Strathfield Council **DoP Submission Nos 121 & 159**
	An estimated 10,000m3 of flood storage would be lost as a result of the proposed development.	To be addressed as part of the detailed design phase.		
	Council has carried out a preliminary assessment of the hydrology and hydraulics report prepared by SKM. It is noted that the proposed method of stormwater runoff management outlined in the report does not meet Council's standard requirements and is not acceptable.	Stormwater runoff management has been satisfactorily discussed in the EA. It will be addressed in detail during the detailed design phase.		
	Enfield Intermodal Logistics Centre (ILC) must maintain storm water detention basins.	A detention basin would be constructed at the southern end of the site, immediately north of Coxs Creek. This would also be used to treat run off prior to discharge. The detention basin would be designed to ensure post development peak flows do not exceed pre-development peak flows. The performance of the basin system will be maintained by SPC.		
	The applicant's consultant in his report has made reference to four individual drains that traverse the site. It appears that Council's 600mm reinforced concrete pipe that drains the upper section of Roberts Road sub-catchment area also traverses the site. Council's existing 600mm reinforced concrete pipe on the upstream of end of the catchment shall be physically located. Capacity and condition of the pipe shall be verified. If it is found that the pipe is under capacity or it is in poor condition, then the pipe shall be replaced in full length to 1 in 20 ARI standard. - All pipe laying and construction works shall comply with the requirements of any Australian standards and codes, as well as manufacturer's specifications. Occupational Health & Safety and Workcover legislation requirements are to be adhered to at all times. - For reinforced concrete pipes (RC) and fibre reinforced cement (FRC) pipes, spigot and socket rubber ring joints are required. All other materials are to be to the manufacturer's specifications for jointing. All pits in public roads are to be constructed in reinforced concrete, and kerb inlet pits in accordance with Council's standard drawing 284-13. - Stormwater runoff from the development site that has the potential of contamination by specific pollutants shall require treatment and be discharged in accordance with the requirements of the Environmental Protection Authority	Noted. Stormwater, runoff and management were addressed in the EA in Chapter 10. More detailed studies will be undertaken as part of the detailed design.		

Issue Category	Comments	Response	Stakeholder ID	Name
	(EPA). - Sediment control measures shall be provided and regularly maintained during the construction activities. The measures are to be in accordance with the "Urban Erosion And Sediment Control" Handbook, available from the NSW Department of Conservation and Land Management (CALM). - Prior to occupation/use of the buildings and release of any security bonds, written verification from a suitably qualified professional civil engineer shall be obtained, stating that all stormwater drainage and related work has been constructed in accordance with the approved plans and complies with Council's standard requirements. In addition, full works-as-executed plans, prepared and signed by a registered surveyor, shall be submitted to and accepted by Council. Where changes have occurred the plans shall be marked-up in red ink and shall include levels and location for all drainage structures and works buildings (including floor levels) and finished ground and pavement surface levels - The potential for modification or adjustments to OSD storages and surface flow paths through the site is significant enough to warrant extra protection. A restriction As To User / Positive Covenant under Section 88E of the Conveyancing Act shall be created on the title of the property detailing the: a) overland flow path b) on-site stormwater detention systems The wording of the Instrument shall be submitted to, and approved by Council prior to lodgment at Land & Property Information NSW. The Instrument shall be registered prior to occupation/use of the building and a registered copy of the document shall be submitted to and accepted by Council prior to the release of the drainage bond. The positive covenant referred to in above is required to prevent future modification or alteration without the written consent of Council, and to ensure suitable maintenance is carried out.			
Hydrology	Submission No 164 It is noted that detention basins are proposed to be built. It is suggested that the EAR consider whether these basins could be defined as a "dam". If so, the NSW Dams Safety Committee should be consulted. Irrespective of this, there should be a program put in place for on going monitoring and inspection of these basins.	In its submission the Department of Natural Resources has advised that the detention basin would not be classified as a dam.	815	Bankstown City Council **DoP Submission No 164 &328**

IssueCategory	Comments	Response	StakeholderID	Name
justification for project	The Victorian Government also proposed to improve freight transportation by rail from 10% to 30% by 2010. SKM's findings resulted in an estimation of 3.34 million container moves for the calendar year 2002. The alarming statistics documented indicates that 80.9% of moves were by road and only 19.1% of containers moved by rail. As the Enfield site has been modelled on Melbourne operations, the statistics outlined above would certainly raise the question 'Is the NSW Government policy to increase freight transported by rail actually achievable?' During the Sydney 2000 Olympic Games, restrictions were placed on operations at Port Botany. To overcome this, Port Kembla was efficiently and effectively used with no disruptions to business or trade. As a result of this, it has been shown that containers can be moved from Port Kembla to western Sydney quicker than they can from Port Botany. This option should be considered to reduce truck movements in the Enfield area as the majority of containers and their contents are destined for sites west of Enfield. It is understood that the current Darling Harbour / White bay terminal operations are to be relocated to Port Kembla in the future yet this has not been referred to in the proposal and any future impact that it may have on the proposed ILC site at Enfield. Surely the primary objective of any rail freight transport strategy should be to relieve congestion on the road network. Strathfield Municipal Council strongly requests that a broader consideration of the rail freight transport strategy for the Sydney Metropolitan area be conducted. Sydney Ports frequently refer to the site of the proposed Enfield ILC as being at the centroid of the market that it serves. The reality, however, is that the Enfield site is at the western end of the "neck of a funnel" 18 km long. The market referred to being predominantly to the west of the chosen site. The proposed site merely transfers road network access from a point of congestion at Foreshore Road and General Holmes Drive to an alternatively congested part of the road network at Enfield. It would appear to be far more beneficial to locate any such Intermodal Logistics Centre further west to the actual centre of the market being serviced, thereby utilizing rail for a greater proportion of the overall transport task.	The Enfield site has not been modelled on Melbourne intermodals. The Melbourne data was used to provide advice on the daily profile of container movements from an intermodal site, not the total which would be switched from road to rail. In any case, whether the NSW Policy is achievable is a matter for the NSW Government and the proposed ILC at Enfield forms a part of that policy. The EA states clearly that up to 56% of the containers into Sydney via Port Botany are transported to the inner and middle western areas of Sydney. This is effectively the catchment of the ILC at Enfield. Transport from Port Kembla to this catchment area would not be more efficient that the proposed arrangement. The White Bay operations relate to motor vehicle transport, not containers. There will be no impact or interaction with the ILC site at Enfield. SPC to consider the response to this comment in line with other studies undertaken and in consideration of the review undertaken as part of the Metropolitan Rail Strategy. The site of the ILC at Enfield is the most appropriate, available site to service the catchment. There are no appropriate sites available in the western part of the inner and middle western catchment. Sites will be developed in the future in the western and south western areas of Sydney, but it would be inefficient to transport to those sites by rail and then transport back to the inner and middle western catchment area by truck.	832	Strathfield Council **DoP Submission Nos 121 & 159**
justification for project	The FIAB report goes some way towards this, but is still not an adopted strategy. Until there is an adopted strategy, development of an Intermodal Logistics Centre at Enfield is considered to be premature.	The FIAB report prepared as part of the Government's Metropolitan Intermodal Freight Strategy for Import and Export Containers (refer Metropolitan Strategy – Transport Strategy for Sydney) supports the need for the Enfield ILC as part of a number of intermodal terminals required to serve the Sydney Basin and to	816	(Canterbury Council **DoP Submission Nos 157 & 162**

		achieve the Governments mode share target.		

Issue Category	Comments	Response	Stakeholder ID	Name
Land Use	It should be noted that Strathfield Municipality has a large amount of schools within the catchment area and road safety is a major concern.	Seven schools are located within the study area. Of these – two are in the Strathfield Municipality – Strathfield South High and Strathfield South Public – both on the Hume Highway. 14 accidents were recorded in the vicinity of these schools over a 5-year period (1999-2004 – source: RTA), none involving heavy vehicles The location of schools will be a major consideration when preparing the Construction Traffic Management Plan and the Local Area Traffic Management Plans.	832	Strathfield Council **DoP Submission No s 121 &159**
	A Caveat should be placed on the title of the land to prevent its use for anything other than a community and ecological area and prevent it being sold.	It is noted that Strathfield Council is seeking ownership of the land to be transferred to Council.		
	Access to ecologically sensitive areas should be limited to school and community groups under supervised guidance.	The Community and Ecological Area will be accessible to the public, under guidance. The details of this will be determined at a later date.		

Issue Category	Comments	Response	Stakeholder ID	Name
management	If approval is granted for the Enfield Intermodal Proposal, the following conditions should apply: 1. All traction power shall be from modern electric powered locomotives that meet current noise and emission standards. 2. All rolling stock have modern low noise and movement type couplings. 3. All timber sleepers be replaced with concrete, low noise type sleepers. 4. A curfew on train operations between 2200 and 0600 hours Monday - Friday, 2200 and 0800 hours and at no time on Sundays be implemented to provide time for regular and unplanned maintenance and also to allow some respite from noise for local residents. A Works Permit shall be obtained from Council's Customer Service Centre at least 48 hours prior to undertaking any works on public/Council controlled areas. This includes any work on the nature strip, footpaths, driveways, stormwater outlets, Council's drainage, kerb & guttering and roadways. The permit must be retained on site at all times and produced on request from any Council Officer. Enfield ILC a comprehensive incident management plan needs to be provided to demonstrate how the operators of the Enfield ILC propose to manage the impacts of an incident involving dangerous goods and vehicles carrying dangerous goods. It is recommended that appropriate site operation hours for this proposal, should the proposal be approved, be 6.00am to 10pm Monday - Friday and 8.00am to 10.00pm on Saturdays and at no time on Sundays. This is to ensure that most of the affects of the proposal such as noise and traffic impacts from the site operation and associated truck and rail movement will not occur outside the hours of operation.	Locomotives on the ILC site will be required to comply with Government requirements. New sleepers will be concrete. The details will be incorporated into the detailed design. It is proposed that the ILC would operate 24 hours a day 7 days a week. The operation of the ILC would be managed through the Operational Environmental Management Plan to minimise impacts to local residents and the environment. All necessary and relevant permits would be obtained prior to works commencing. An incident management plan will be prepared prior to the opening of the Intermodal Logistics Centre. It is proposed that the ILC would operate 24 hours a day 7 days a week. The operation of the ILC would be managed through the Operational Environmental Management Plan to minimise impacts to local residents and the environment.	832	Strathfield Council **DoP Submission Nos 121 & 159**
management	A curfew be imposed from 2200hrs - 0600hrs Monday - Friday and 2200hrs - 0800hrs Saturday and at no time on Sunday to minimise traffic and noise pollution. No storage of goods, material, equipment, machinery, refuse, or refuse bins (including industrial waste containers) and the like shall take place on the public footpath or carriageway during development of the site unless the specific written approval of Council has been given and subject to further conditions and payment of fees for the use of Council's land.	It is proposed that the ILC would operate 24 hours a day 7 days a week. The operation of the ILC would be managed through the Operational Environmental Management Plan to minimise impacts to local residents and the environment. All waste and equipment will be stored on the ILC site and managed through the Construction and Operation Environmental Management Plans.	832	Strathfield Council

	If approval is granted the following conditions should apply: ▪ During the detailed design stage a suitably qualified contamination consultant shall be employed to further investigate the areas of the road bridge western landing point, road bridge footings, rail network connection points and around acoustic barrier walls for possible contamination. ▪ The remediation work being classified as Category 2 should be reassessed in light of whether the contamination in the Community and Ecological Area is likely to pose a significant risk to the Green and Golden Bell Frog, which is a threatened species. ▪ A Remediation Action Plan (RAP) is required prior to remediation work commencing. This would be prepared in accordance with DEC guidelines, SEPP 55 and the Contaminated Land Management Act 1997. This RAP should include provisions for inspection and validation of soils beneath existing structures when they are removed and any hotspots that are uncovered during site development works. ▪ All the recommendations contained in both of the site audits shall be implemented. ▪ Following remediation all exposed surfaces are to be validated to ensure that all TPH, asbestos and heavy metal contamination has been removed An excavation permit or exemption permit under the NSW Heritage Act should be obtained prior to disturbing any footings or railway tracks remaining in the ground.	Investigations would be undertaken in off site areas identified during the detailed design phase. These would be completed by a suitably qualified contaminated land specialist. Further investigations are to be undertaken into the contamination hotspot (As) within the proposed Community and Ecological area to determine the significance and extent of the elevated levels of the heavy metal previously identified. A risk assessment would be undertaken to determine the threat to sensitive receptors including the GGBF. This information would be used to assess remediation options. A RAP is to be prepared and identified contamination to be remediated prior to earthworks commencing. Soils from beneath removed buildings would be visually inspected and testing undertaken if evidence of contamination is present or if the soils are observed to be different from the surrounding area. Validation testing of remediated hotspots and all exposed surfaces is to be undertaken to ensure contaminant levels are below threshold levels defined within the RAP. The recommendations from audits, EA and required off-site investigations would be included in the RAP. See comment above. As the project is a Major Project, subject to Part 3A of the EP&A Act, the Heritage Office advises that an excavation permit under the Heritage Act will not be required. The Heritage Office will, however, be consulted during the process of excavation.		
management	Council considers that there is a need for a detailed Environmental Management Plan to be prepared to help manage impacts during both the construction and operational phases of the facility. Council supports the preparation of EMPs for both the construction and operational phases of the facility. However, it is considered that the EAR includes only an outline of what should be included in the EMP, and that they need to be prepared to a much greater level of detail.	An Environmental Management Plan is to be prepared for both Construction and Operation Phases. See Chapter 21. The EMPs would be prepared by the Construction Contractor once details of the construction methodology and final design are available.	815	Bankstown City Council

	Previous sections of this submission have identified areas of concern to Council, and noted that the recommendations fro some measures such as a noise management plan and a dust management plan need to be thought through and developed to a higher degree of detail before there can be confidence that they will reduce impacts to an acceptable level. In the case of noise, and perhaps also air quality impact it is fair to say that there will be impacts of a significant level unless these issues are managed properly, so in Councils view, the proposal should not be approved until a appropriate mitigation measures are put in place and ongoing measures to manage these impacts are identified and prescribed as conditions for approval.	See comment above.		
	As well as the inclusion of specific means to mitigate impacts, the EMP should identify responsibilities for implementing its recommendations, as well as for regular monitoring of its effectiveness, and reporting of the environmental performance of the facility.	The EMP would include named personnel with specific responsibilities for implementing, monitoring and managing specific environmental impacts.		
	It would also be appropriate for a Consultative Committee to be established that includes representatives from Bankstown and Strathfield Councils as well as Sydney Ports, the Department of Planning and perhaps other agencies to provide ongoing review of the environmental performance of the facility.	A Community Liaison Committee would be established as detailed in Chapter 21 of the EA.		
	CONCLUSIONS MANAGEMENT Environmental management. Council considers that there is a need for a detailed Environmental Management Plan to be prepared to help manage impacts during both the construction and operational phases of the facility.	These plans would be prepared prior to construction commencement on site.		

Issue Category	Comments	Response	Stakeholder ID	Name
Noise	Whilst it could be argued that Sydney Ports Corporation does not have responsibility for the noise impact from locomotives travelling to and from the Intermodal Logistics Centre (ILC) at Enfield, Council believes that the State Government does, and therefore the Environmental Assessment (EA) report should consider the bigger picture and include this issue in the assessment. The proposed ILC will have an adverse impact on nearby residences in the Cosgrove Rd/Blanche St area from construction noise in adverse weather conditions during the construction phase even with mitigation measures in place. The modelling of noise impacts from road traffic and the conclusion that no exceedances or significant impact will result from road traffic are seriously questioned due to inaccurate traffic volume data.	The appropriate approach to the management of effects from the rail freight line corridor is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. **Construction noise** Construction noise was assessed in the report to the nearest affected residential receivers, as these were closer to the site than other sensitive receivers, including St. Anne's School and Strathfield South High School. Further to this the Strathfield South High School is shielded from the site by the industrial area to the north of the site and the existing noise wall along the southern boundary of the school. There are no DEC criteria that distinguish appropriate levels for residential receivers versus non-residential receivers and impacts at non-residential locations would be similar to or less than those identified for residential locations. Therefore the assessment that has been undertaken for the construction phase noise is considered appropriate. SPC will seek to maintain the construction times as specified in the EA. However, an undertaking will be provided, and written into the Noise Management Plan, that high noise operations will not be undertaken after 1pm on Saturdays. **Road Traffic noise** The project is not responsible for existing road traffic noise levels. The contribution to traffic noise from this project is calculated to be in the order of 0 – 0.2dB(A) at residential receiver locations – refer to the RT&A Technical Memo (Appendix E). Such a small traffic noise increase is considered minor, insignificant and inconsequential. Furthermore, the NIA found that mitigation of existing noise, through the provision of noise barriers for residences is not possible as driveway access to roads is required. Therefore it would not reasonable and feasible to reduce traffic noise levels. The assessment carried out in the NIA, compares 2016 traffic noise levels (with ILC) to 2006 future-existing	832	Strathfield Council **DoP Submission Nos 121 & 159**

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		noise levels (without ILC). This type of assessment is considered to be more conservative than a direct comparison in 2016. Nonetheless, an assessment which compares traffic volumes for with and without ILC (ie natural growth only) is attached in the RT&A Technical Memo (in Appendix E).		
Noise	The noise impact from trains on the site has only been assessed from locomotives idling on the track and not moving. Assumptions have been made for modelling purposes that may be inaccurate. Noise modelling for operations on site are generally accepted however experience has shown that impact noise from metal surfaces can cause significant noise impact. This impact noise could be from trucks with or without loads or from the handling of containers and has not been considered in the prediction. Neither have measurements been provided from an existing port facility at Botany been presented and data extrapolated from it. Noise predictions for road traffic noise are jeopardised by inaccurate existing traffic volumes. See Works Section submission on Traffic and Transportation. Construction noise may exceed the NSW DEC construction noise criteria even with the recommended noise mitigation measures. Proposed construction hours will exceed those recommended by the ENCM guidelines. The Enfield Intermodal proposal is not supported and should not proceed for the following reasons: ▪ A revised noise assessment report should be submitted to the Minister prior to approval. ▪ The report should model and assess noise	Assumptions made in the assessment were conservative but also based on appropriate operations. The major likely noise sources during site operation were provided in the modelling. This included vehicle movements. Source noise levels used in the NIA were from measurements undertaken by Renzo Tonin for various past projects and from our noise source data base. The data was measured at various locations, including ports/interchanges (Glebe island/White Bay, Prot Botany, Moree), warehousing facilities and industrial facilities. The noise sources used are considered representative of the type of noise sources that will be generated on the ILC site. See comment above. See comment above on construction noise. More detailed assessment would be carried out during preparation of the CNVMP. This would take into consideration predicted noise levels with mitigation measures. Noise impacts were addressed adequately in Chapter 11 and Appendix E of the EA. Rail noise issues were addressed in Chapter 8.	832	Backhouse, David (Strathfield Council) **DoP Submission Nos 121 & 159**

Issue Category	Comments	Response	Stakeholder ID	Name
	impacts from locomotives using the dedicated freight rail line between Port Botany and the proposed site. It should also include measurements from an existing port facility at Botany and extrapolate predicted noise from the data, and model and assess noise impacts from predicted road traffic using accurate traffic volume data. ▪ Construction noise may exceed the NSW DEC construction noise criteria even with the recommended noise mitigation measures. ▪ Proposed construction hours will exceed those recommended by the ENCM guidelines. ▪ Noise predictions for road traffic noise are jeopardised by inaccurate existing traffic volumes. ▪ Predicted noise exceedances of up to 15dB(A) for sites A4 to A6, 7dB(A) for site A15, 10dB(A) for site A1 and 6dB(A) for site A2 may occur under the most adverse wind conditions.	More detailed assessment has been carried out and is presented in the PRP (RT&A Technical memo attached in Appendix E). Mitigation measures will be further developed during preparation of the Noise Management Plans at Construction and Operational phases.		
Noise	The treatment of noise assessment of train noise on this line in the EA is considered to be inadequate for a number of reasons that are outlined below: ▪ The EA is using second hand noise assessment information which it has not independently critiqued. The basis for this noise assessment conclusion is also not provided. ▪ The EA seems to mask this critical impact in with overall noise impact. ▪ Also no consideration has been given to the noise differences between freight trains and City Rail passenger trains. The EA has not considered noise and vibration mitigation measures including train scheduling, curfews and physical measures as requested. This assessment should take into consideration the recent Rail Infrastructure Corporation/State Rail Authority Interim Guidelines for Consideration of Rail Noise and Vibration in the Planning Process. If residential areas do not meet these standards then the EA should address actions that are needed to overcome this.	The appropriate approach to the management of effects from the rail freight line corridor is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	816	Canterbury City Council **DoP Submission Nos 157 & 162**

Issue Category	Comments	Response	Stakeholder ID	Name
	There is a wider issue that needs to be considered which is of the noise and vibration impacts arising from the future operation of the freight line. No overall assessment has been made of these impacts. As train movements are projected to triple in the next 20 years, this assessment is considered critical. With such an assessment it can be determined if such increases are environmentally acceptable. If works are required to be undertaken to mitigate impacts, then these should be planned for. While the Enfield proposal will not result in all of this impact, it will contribute to it and should proportionately contribute for any noise mitigation measures required. Noise generated by construction activities may also potentially exceed NSW DEC criteria, the assessment is inappropriately vague about this issue. In the EA is suggested consideration only of noise mitigation measures. Again this is an unsatisfactory situation for affected residents. Appropriate measures should be put in place to create an acceptable level of construction noise. If noise impacts arising from both the construction and operation of the site cannot be satisfactorily mitigated the proposal should not proceed in its current form.	The construction noise impact assessment required to identify impacts was prepared at a stage when many assumptions are made about the construction process. More detailed assessment would be carried out as part of the CNVMP, when construction details including specific plans and equipment are known. Appropriate mitigation measures would be considered at this time.		
Noise	• Noise impacts Council has concerns about noise impacts. In spite of the findings of the EAR there are concerns that a significant number of residents in Greenacre could be affected by noise during the construction and operation of the facility. There are also concerns that the proposed mitigation measures will not be effective, and that the noise impacts have been underestimated. • Noise Impacts; Council has concerns about noise impacts during both the construction and operational phases. We are concerned about the predicted noise levels included in the EAR, many of which exceed relevant criteria, and the fact that even these noise levels may have been underestimated. We are also concerned that the numbers of residences potentially affected by noise may have been underestimated, and that the proposed mitigation measures will not be effective. Councils Concerns about the Noise Assessment. Council is extremely concerned about the likely noise impacts on residents of Greenacre that will result from this	**Construction Noise** Construction noise was assessed in the report to the nearest affected residential receivers and the assessment that has been undertaken for the construction phase noise is considered appropriate. Mitigation measures will be further developed during the preparation of a Construction Noise Management Plan. SPC will seek to maintain the construction times as specified in the EA. However, an undertaking will be provided, and written into the Noise Management Plan, that high noise operations will not be undertaken after 1pm on Saturdays. **Operational Noise** Mitigation options were extensively reviewed as part of the EA. It is considered that at this stage of the project, when the design is still fairly flexible, all reasonable and	815	Bankstown Council **DoP Submission Nos 164 & 328**

Issue Category	Comments	Response	Stakeholder ID	Name
	proposal both during construction and operation. Reasons for Councils concerns are as follows: Concerns about the Assessment Technique. a) Omission of Truck Noise Council is concerned that traffic noise from trucks that are associated with the facility has not been included in the overall noise assessment. Whilst trucks that are moving within the facility are considered, trucks associated with the facility but which have just left (and may for example be on Wentworth St) appear to have been omitted. However, given that there will be about 1160 trucks per day (or close to 50 trucks per hour which is almost 1 per minute on average) these trucks would very likely contribute to the overall noise environment. Nevertheless, they have not been included in the total noise assessment, but instead have been assessed separately. This may mean that the noise impacts from the facility have been underestimated. b) Impact of south-easterly winds Council is also concerned that the impact of south easterly winds which have been assessed and shown to produce noise exceedences may have been underestimated. The reason for this concern is that in the section of the EAR on air quality impacts (Fig 5.1 in Appendix F in Vol 3) it also states that south easterly winds can be an issue in Spring as well as summer. Spring south easterly winds have not been factored into the noise assessment, and at the very least it appears that there is an inconsistency in the methodology for the assessment of wind on noise impacts and on air quality impacts. However, given that the south easterly winds help to produce significant exceedances of the noise criteria, it is likely that if they also occurred in Spring, then moreexceedances would occur, and the extent of noise impact would be much higher than predicted. Concerns about the Impacts of Construction Noise. Council is concerned about the likely noise impacts to the residents in the suburb of Greenacre during construction. The results show that there will be significant exceedance of the noise criteria at both monitoring locations. The potential number of residences affected by noise impacts could be large - much larger than the 70 residence or that is suggested in the EAR - we believe it is more likely to be several hundred residences, that will experience noise in	feasible mitigation measures have been considered to reduce overall noise emissions from the site. Additional mitigation will need to be considered at the design phase to reduce noise levels to achieve compliance with the Project Specific Noise Levels (PSNLs). Any further measures considered would include source specific measures, such as limiting plant noise levels and use of local shielding (eg container stacks, sheds, buildings) in specific locations. These more specific design matters are difficult to determine at this stage of the project. However, in response to concerns regarding noise exceedances, the most likely or typical operational scenario has now also been modelled from all available information known at this stage of the project, and the results of this assessment are presented in the RT&A Technical Memo in Appendix E. It is noted that noise-enhancing wind conditions do not necessarily occur for one third of the year from any single direction. Instead they are expected to occur for a range of different directions depending on the time of year and time of day – see the RT&A Technical Memo in Appendix E, which presents the outcomes of a more detailed analysis on wind data. This shows that different noise receivers are impacted for different seasons of the year and at different periods of the day. Given the above, a “worst case” noise model was built and a conservative assessment was undertaken and presented in the NIA in accordance with all relevant noise policies and guidelines. The RT&A Technical Memo presents areas of conservatism which are built into the assumptions used in the NIA noise modelling for assessing impacts at night, and what effect each of these would have if one were to model a more realistic, likely or typical night operational scenario at this stage of the project. So in response to this, typical operational scenarios have now also been modelled from all available information known at this stage of the project, for the Day, Evening and Night periods respectively. For each of the three assessment periods, noise was modelled for calm conditions and for the worst-case wind conditions.		

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	excess of the criteria during the construction period. The attached map (overleaf) shows the area that may be affected by noise impacts. We are not necessarily saying that all these residences will definitely be affected, as the extent of affectation will depend upon a number of factors. The map is included simply to indicate that many residences are located within reasonable proximity to the site and may be affected if noise levels exceed the criteria and if effective mitigation measures are not developed to manage noise impacts appropriately. Whilst there is a suggestion for mitigation measures, the EAR (sec 11.10) only says "they will be considered". Council considers this to be an unacceptable response to the management of an impact that could significantly affect large numbers of people. Whilst Council accepts that construction noise will not be long term, in view of the exceedances of the criteria that will occur, and the number of residences that may be affected, there is a need for much more thought to be put into mitigation measures. Concerns about the Impacts of Operational Noise and the Lack of effective noise mitigation measures. Council is also very concerned about the operational noise impact, given that the EAR acknowledges that there will significant exceedances of the accepted criteria for noise levels for all types of noise disturbance whether intrusive noise, amenity noise, sleep disturbance and in the operation of the facility during the summer months. It appears that the noise impacts will occur even after physical noise barriers are constructed and mufflers fitted to the plant that will be operating on site. Again the suggestion of a noise management plan incorporating certain reduction measures is made. However this does not appear well thought out and with no commitment to making it work. Additionally, some of the sources of noise impact do not seem to be amenable to mitigation by the suggested measures. As an example, the EAR states that noise exceedance. caused by adverse wind conditions cannot be mitigated by increasing the height of the barrier, so there will be no effective way of managing the noise impact when the south easterly winds blow (and as noted previously, these winds may blow much more frequently than acknowledged in the EAR). As another example, noise emanating from loading/unloading/stacking operations cannot be muffled	Separate noise models for the 'intrusiveness' and the 'amenity' assessment periods, were run to allow for the direct assessment of impacts for each scenario during each of the three assessment periods. The results of these assessments are presented in the RT&A Technical Memo in Appendix E. In summary compliance is achieved with both the 'Intrusiveness' and the 'Amenity' PSNLs under calm and worst-case noise-enhancing wind scenarios, at all receivers with the exception of a few minor exceedances during adverse wind conditions of 1-2dB(A) and one 5dB(A) exceedance under adverse wind from one specific direction. These results do not include additional noise mitigation measures, such as those discussed in the RT&A Technical Memo, therefore, there is scope to further reduce noise emission levels from the operation of the site as part of the DD / EMP phase in order to comply with the PSNLs. Any further measures considered at the detailed design stage would include source specific measures, such as limiting plant noise levels and use of local shielding (eg container stacks, sheds, buildings) at specific locations etc as described in the RT&A Technical Memo in Appendix E. After all reasonable and feasible measures are considered at the detailed design stage all physical and management noise control measures will be incorporated into the EMP for the site. It is noted that the number of houses affected shown in Table 4.12 of the NIA is high as the noise model was conservative in not taking into account local shielding provided by residential and other non-industrial buildings off site. Such building data was unavailable for inclusion in the noise model at this stage. It is intended that building data be included in the detailed noise model to be run at the Detailed Design / EMP phase, which is expected to show a significant reduction in the number of houses affected. Therefore, an analysis of the number of affected houses would be more accurately conducted at the DD / EMP phase and after all additional reasonable and feasible noise mitigation options, as set out in the RT&A Technical Memo (in Appendix E), have been incorporated into the noise		

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	and are apparently unmitigable. At times the exceedances that will occur are not trivial (1 OdBA) at times, and as a result of the noise impacts we consider that at this stage without further work being done to reduce the impacts of operational noise, the proposal is not suitable for approval. Numbers of People Affected. To further highlight our concerns, Council is very concerned about the numbers of people that will be affected by the unacceptable noise levels. Whilst the EAR admits that exceedances will occur, it does not accurately relate this to the number of people who will suffer. The EAR does note that some 70 residences could be affected by noise. However, we believe that in certain situations - over the summer when the south easterly winds blow, and if the noise mitigation measures fail, then there could be several hundred residences affected (basically all residences north of Ivy Street and some south, extending some distance westward depending upon the severity of the noise plume). We believe that it is not appropriate to approve the proposal given the fact that noise level criteria will be significantly exceeded and there is no reliable prospect of mitigating these exceedances, and as a result a large number of people will be affected. The Need for a Noise Management Plan. Section 11.8 of the EAR proposes that a Noise Management Plan be prepared prior to the commencement of works. Council supports this recommendation. However, it is considered essential that this plan be prepared and submitted for approval as part of the assessment process, and that it include adequate detail to ensure that noise impacts will be reduced to acceptable levels. Unless this, occurs, then there cannot be the confidence that the proposal will operate at an acceptable level of noise impact, and the EAR appears to be deferring the resolution of an important environmental issue to after the approval has been obtained. Given the levels of exceedances of relevant noise criteria in some instances, the potential numbers of people that could be affected, and the concerns Council has raised about the likely efficacy of some of the mitigation measures it is important that approval only be given to the proposal when it can be shown to operate without causing undue noise impact during both the construction and operation impact. This can only occur if the noise management plan is developed in detail and considered as	model. Exceedance of the noise criteria was predicted after the application of mitigation measures, but only during adverse wind conditions and mostly in terms of the 'amenity' criteria. The modelling conservatively assumes that the site is operating at capacity and all plant is operating at full load over the entire night-time 9 hour assessment period. As this is unlikely to occur, then the typical operational scenarios have now been modelled. The results of these assessments are presented in the RT&A Technical Memo in Appendix E. In summary compliance is achieved with both the 'Intrusiveness' and the 'Amenity' PSNLs under calm and worst-case noise-enhancing wind scenarios, at all receivers with the exception of a few minor exceedances during adverse wind conditions of 1-2dB(A) and one 5dB(A) exceedance under adverse wind from one specific direction. These results do not include additional noise mitigation measures, such as those discussed in the RT&A Technical Memo, therefore, there is scope to further reduce noise emission levels from the operation of the site as part of the DD / EMP phase, when more specific details about the site and its operations are known, in order to comply with the PSNLs. After all additional reasonable and feasible measures are incorporated into the design at the DD/EMP phase (as set out in the RT&A Technical Memo in Appendix E), it is expected that the PSNLs will be achieved. The DEC's sleep arousal criterion is currently being reviewed, as the general opinion is that this criterion is conservatively low. For the NIA, guidance was taken from the EPA's ENCM, which provides a conservative criterion, and the ECRTN, which sets a suitable criterion which will ensure that 90% of the population (including the aged) are protected in their sleep, based on recent research. However, it is understood that the current DEC thinking is that an initial screening test should be carried out to determine whether instantaneous noise sources at night comply with the criteria established in the ECRTN. If noise levels are found to exceed, more		

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	part of the assessment process, and that it is considered before any approval is given to the proposal. Summary of Councils concerns about Noise In summary, Council considers that the management of noise is a critical issue in both the operational and construction stages of this proposal. Presently, Council considers that the EAR has not shown that the proposal can operate or be constructed without generating severe noise impacts. As explained in our submission, we take this view for the following reasons: • flaws in the assessment technique which we think may have underestimated the extent of noise impact; • the predicted noise levels, which are at time significantly in excess of the relevant criteria; • the numbers of people potentially affected by noise (perhaps several hundred); and • the noise mitigation measures that are proposed do not appear as though they will be effective in reducing noise to acceptable levels; • the need for a noise management plan to be prepared and submitted for assessment before any approval for the proposal NOISE CONCLUSIONS Noise Impacts; Council has concerns about noise impacts during both the construction and operational phases. We are concerned about the predicted noise levels included in the EAR, many of which exceed relevant criteria, and the fact that even these noise levels may have been underestimated. We are also concerned that the numbers of residences potentially affected by noise may have been underestimated, and that the proposed mitigation measures will not be effective.	detailed analysis is required to determine the extent of potential disturbance to sleep, based on the number of events, timing of events etc. Notwithstanding this, a more detailed analysis of sleep disturbance issues is carried out and included in the RT&A Technical Memo (Appendix E), based on several assumptions.		
Noise	It is not considered that matters relating to rail nose and vibration (on the freight train line between Port Botany and Enfield) have been properly addressed. ▪ Frequency of freight trains as anticipated in the environmental assessment ▪ Rail noise and vibration from the freight line in the Marrickville Local Government Area Quite simply, it considered unacceptable that neither the Environmental Assessment for the proposed Enfield	The appropriate approach to the management of effects from the rail freight line corridor is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	489	Marrickville Council **DoP Submission No 58**

Issue Category	Comments	Response	Stakeholder ID	Name
	Intermodal Logistics Centre, nor the Port Botany Expansion EIS, has undertaken a full and accurate assessment of the noise and vibration impact of freight rail trains (moving between both facilities) upon dwellings located in the Marrickville LGA. Rather than conducting any original assessment of the impact of freight rail noise and vibration upon dwellings in the Marrickville local government area (LGA), the Environmental Assessment simply makes reference to the assessment contained in the Port Botany Expansion EIS of early 2004. The above paragraphs identify Marrickville Council's serious concerns regarding the methodology which Sydney Ports Corporation has used (with regards to both the expansion of Port Botany and the proposed Intermodal terminal at Enfield) in regards to the impact of rail noise and vibration. Due to these serious and ongoing concerns, Marrickville Council requests that the current Intermodal Logistics Centre proposal not be approved - until such time as Sydney Ports Corporation has conducted a full and accurate assessment of the noise and vibration impact that freight trains (including the additional trains as a result of an expanded Port Botany and an intermodal terminal at the Enfield marshalling yards site) travelling between Port Botany and Enfield would have upon dwellings in the Marrickville local government area - with the assessment making commitments in regards to consultation with affected residents, and the installation of noise mitigation works which would result in compliance with Environmental Protection Authority rail noise criteria. Marrickville Council is eager to ensure that the impact of noise and vibration generated by trains moving between an expanded Port Botany and an Enfield Intermodal Logistics Centre - is properly addressed. It is clear that the expansion of Port Botany and a proposed Enfield Intermodal Logistics Centre are intrinsically linked. For these reasons, Marrickville Council would reject any suggestion that matters relating to rail noise and vibration have already been fully addressed in the approval of the Port Botany expansion - and that these matters cannot be further addressed in a consent which applies to the proposed Enfield Intermodal Logistics Centre. Marrickville Council's serious concerns regarding the methodology used by the Port Botany Expansion			

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	Environmental Impact Statement of early 2004 in regards to the assessment of freight rail noise and vibration - were first raised in the Southern Sydney Regional Organisation of Councils' submission to the then Department of Infrastructure and Planning in early 2004 (as attached, on page 36). These matters remain unaddressed by Sydney Ports Corporation.			

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	As the subject site is listed as a 'Deferred Matter' under the Draft LEP 2003 (which is currently yet to be gazetted) it is recommended that should this proposal be approved that the land be suitably zoned in the Draft LEP 2003 as 'Special Uses (Railways) 5C' zoning. The proposed community/ecological area land should be rezoned as 6b (Proposed Open Space Zone) for the Community area and 7 (Environmental Protection Zone) for the Frog Habitat Area (in accordance with the zoning categories in the draft Strathfield LEP 2003). Considering the size and impact of this proposed development it is requested that the following contributions be made to the local community • the proposed development be subject to section 94 contributions should Council decide to levy Section 94 contributions from Industrial developments as part the 2006 five year review of Strathfield Council's Section 94 Plan. The proposed development be subject to section 94 contributions should Council decide to levy Section 94 contributions from Industrial developments as part the 2006 five year review of Strathfield Council's Section 94 Plan. Specific contributions on an annual basis (in addition to Section 94 & the Community/Ecological Area) should be made for local community benefit in line with Strathfield Councils identified planned community and recreational facilities in the South Strathfield area. Enfield Intermodal Logistics Centre should be levied to cover maintenance costs of the Proposed Community + Ecological Area. If approval is granted for the Enfield Intermodal Proposal, the following conditions should apply: • the ownership of the proposed Community/Ecological Area be handed over to Strathfield Council and Sydney Ports contribute to the full cost of ongoing maintenance of this facility. • the proposed development will be subject to section 94 contributions should Council decide to levy Section 94 contributions from Industrial developments as part the 2006 five year review of Strathfield Council's Section 94 Plan. • Specific contributions on an annual basis (in addition to Section 94 & the Community/Ecological Area) should be made for local community benefit in line with Strathfield Councils identified planned community and recreational facilities in the South Strathfield area.	Noted Noted Section 94 fees and levies or any form of contribution to Council for community benefit have not been considered.	832	Strathfield Council **DoP Submission Nos 121 & 159**

Planning	We note that the EAR states that there are no prohibitions in the Special Uses Railway Zone (where the proposed site is located. However, Council is concerned that there is a deficiency in this component of the EAR in that it has not addressed the "offensive" aspects of SEPP 33, even though thisSEPP applies to the proposal, and has a bearing on whether or not the proposal is permissible. The failure to consider this matter and establish the permissibility of the proposal under SEPP 33 is an oversight. We understand however that the proposal is subject to the Strathfield Planning Scheme Ordinance, in which the proposed site is zoned Special Uses Railway. However, it is noted that one State Environmental Planning Policy (SEPP 33 - Hazardous and Offensive Development) which may bear upon the permissibility of the development has not been properly considered. Although SEPP 33 has been addressed in relation to the proposal in terms of hazard, the EAR has omitted any consideration of whether the proposal is "potentially offensive" under SEPP 33. In this regard, the EAR should have considered the different types of polluting discharge emanating from the facility (such as noise, air emissions etc) and formed an opinion as to whether they would be acceptable (in which case the proposal would be considered "potentially offensive industry") or non acceptable (in which case it would be "offensive industry") Given that the EAR acknowledges that there are exceedences or possible exceedences of relevant criteria for noise and air quality, then there could be an argument that the proposal should be classified as an "offensive industry". This is more than a simple technicality because if the proposal is found to be "offensive industry" as opposed to "potentially offensive industry" then the permissibility of the use could be questioned, as such a use could only proceed if it this use was allowed under the zoning.	Noise levels will be managed to a level such that they do not represent an “offensive” activity.	815	Bankstown Council **DoP Submission Nos 164 & 328**
Planning	In the event of the current Intermodal Logistics Centre proposal being approved, the Department of Planning should impose a condition of consent which requires Sydney Ports Corporation to conduct a full and accurate assessment of the noise and vibration impact that freight trains (including the additional trains as a result of an expanded Port Botany and an intermodal terminal at the Enfield marshalling yards site) travelling between Port Botany and Enfield would have upon dwellings in the	The appropriate approach to the management of effects from the rail freight line corridor is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	489	Marrickville Council

	Marrickville local government area - and that the assessment should make commitments in regards to consultation with affected residents, and the installation of noise mitigation works which would result in compliance with Environmental Protection Authority rail noise criteria. It is suggested that in any approval of the current Intermodal Logistics Centre proposal, the Department of Planning should impose a condition of consent which requires that the full and accurate assessment of noise and vibration impacts (detailed above) should be considered by the Rail Noise Working Group identified in condition B2.28 for the approval of the expansion of Port Botany			

Issue Category	Comments	Response	Stakeholder ID	Name
pollution	**Visual pollution** The Visual Impact of the proposal has not been adequately addressed and mitigated. The visual impact of tall stacks of shipping container, site infrastructure, warehouses and the road bridge will be visible from many adjacent and nearby publicly accessible roadways, overpasses and residential areas. Additional site perimeter landscape screen/buffer planting is required to mitigate this detrimental visual impact. **Pollution-light** Light trespass and sky glow produced by artificial lighting are serious matters, which have well known adverse effects upon the natural environment and also upon human health. Apart from sleep disturbance in humans, there is also emerging evidence that night time lighting may play a role in the increased incidence of negative health effects. Reference should be made to Australian standards such as AS 4282-1997, Control of the obtrusive effects of outdoor lighting. It would also be reasonable to expect that the Department will request computer modelling of any proposed lighting installation.	Visual impacts are considered in Chapter 13 of the EA. This included review of the visual implications of the buildings and operations. The landscape plan identified screening measures to minimise the potential for visual impacts. Landscape planting would be developed further during the detailed design phase. Light spill has been modelled from a series of points correlating to the closest residences. Light fittings would be visible at night from most of the key viewpoints assessed during the EA preparation, however, they would not be expected to change the night landscape as the lights would be focussed downwards and would be part of a landscape already containing a large number of light sources. Lighting on site would be designed to meet AS4282 Control of Obtrusive Effects. Consultation will be undertaken with rail corridor owners regarding their lighting requirements to ensure the proposed lighting on the site does not significantly affect adjacent rail operations. Screen planting will also be strategically placed to prevent light spill. Lighting would be addressed during the detailed design phase and the potential for light spill considered when siting lights and providing illumination specifications.	832	Strathfield Council **DoP Submission Nos 121 & 159**
pollution	Section CC indicates only one container stack of 5 containers in height located to the lower section of the northern Empty Container Storage area. In reality many of the stacks would be 6 containers high (16m high), even to the higher side of the storage area. The container stacks would therefore be more visible from the residential areas west of Roberts Road than illustrated in View 18 'Jean Street, Greenacre looking east'. The northern Empty Container Storage Area also would be highly visible from the Roberts Road overpass. The 5 metre high proposed noise wall along Roberts Rd and the existing native tree planting will not adequately visually screen the potential visual impact of the 16 metre high stacks of containers as seen from Roberts Road and the residential properties to the west of Roberts Road. View 7 and 9 also downplays the visual impact of the southern Empty Container Storage Area as viewed from the Wentworth Rd Greenacre residential area and from the Punchbowl Rd overpass. Further details are required on the following: • effect of additional light in favouring populations of	Chapter 16 and Appendix I provide information on the likely views associated with the ILC from key viewpoints. Landscape design to be prepared as part of the detailed design phase would take into consideration the potential changes to the visual environment.	832	Strathfield Council **DoP Submission Nos 121 & 159**

	cockroaches and flies over that of moths? • effect of additional light in disorienting migrating birds? • visual effect of lighting and scatter in misty/foggy/ rainy conditions, and light spill at boundaries then?	Lighting is addressed in Chapter 16 and Appendix I. Light fittings would be designed in accordance with AS4282 Control of Obtrusive Effects Impact on Fauna would be addressed during preparation of the flora and fauna management plans See above comments.		
pollution	There is no mention of the risk of escape to local waterways. In the past the Enfield site has been a source of oil spills into the Cooks River and Coxs Creek and we need to be confident that the new facility will present a very low risk in terms of waterway pollution.	Potential pollutants during construction and operation would be managed in accordance with the construction and operation management plans. An emergency incident management will be prepared prior to the opening of the Intermodal Logistics Centre.	816	Canterbury Council **DoP Submission Nos 157 & 162**
pollution	Light Spill; Council considers that additional work is necessary to ensure that this matter has been adequately addressed Council does not believe that the proposal will cause unacceptable impacts on the existing visual environment. Light Spill Furthermore, any approval for this proposal should include a condition that the development comply with Australian Standard AS 4282-1997 - Control of the Obtrusive Effects of Outdoor Lighting, Council does however have some concerns about this issue. The EAR is very brief in the way it addresses this matter. The statement "the light spill on the neighbouring areas would be virtually undetectable" has not been backed by credible evidence. In a large facility like this with 24 hour operational requirements, the height of some of the components and the level of illumination required will inevitable result in light spill, and given the proximity of some residential dwellings, there is a potential impact due to obtrusive lighting. As a mitigation measure the EAR simply states "lateral light spill and glare is minimised as the light fittings focus illumination downwards". The EAR does not even mention compliance with the relevant Australian Standards for control of obtrusive outdoor lighting (even streetlights in residential streets must meet to meet some standards for intrusive light spills). The EAR should provide further advice about how the proposal complies with relevant Australian Standards for Obtrusive Lighting (such as AS 4282-1997 – Control of the Obtrusive Effects of Outdoor Lighting), Council considers that comment on the potential light impact should be sought from professional bodies such as the Astronomical Society of Australia, and relevant Space Observatories be sought. Furthermore, any approval for this proposal should include	See above comments The light spill impacts are considered in Chapter 16. The proposed lighting would not be expected to change the night landscape as the lights would be focused downwards and would be part of a landscape already containing a large number of light sources. Lighting on site would be designed to meet ASNZS4282 Control of Obtrusive Effects. The effects of light spill were investigated in the EA (Chapter 16) and the Appendix I – Visual Assessment. The impacts of light spill were investigated to determine, in particular, the impacts at night. A preliminary lighting concept was developed for the purposes of modelling light spill. Light spill was modelled from the empty container areas at the northern and southern ends of the site as these would be the closest parts of the ILC to residences. Modelling results were compared against the relevant standard AS4282 –Control of the Obtrusive Effects recommended maximum obtrusive light levels. Recommended illuminance limits are strictest during "curfewed hours" (11pm and 6am). These are 4 lux at the boundary of commercial and residential areas, 2 lux within residential areas described as "light surrounds"	815	Bankstown Council **DoP Submission Nos 164 & 328**

	a condition that the development comply with Australian Standard AS 4282-1997 - Control of the Obtrusive Effects of Outdoor Lighting CONCLUSIONS POLLUTION (light Spill) Light Spill; Council considers that additional work is necessary to ensure that this matter has been adequately addressed.	and 1 lux in residential areas described as "dark surrounds". Further development of the lighting concept would be undertaken during detailed design with due consideration of relevant standards and potential impacts on local residents. Refer to full description in PPR section…..		

IssueCategory	Comments	Response	StakeholderID	Name
Rail Issues	The report discusses volume of freight to be transported by rail but it does not address the important areas of types of locomotives and rolling stock, way and works infrastructure requirements for operations and maintenance. This section of the report is also not related to the other sections regarding noise pollution and air quality. While these are not fatal omissions on their own; when they are combined with the range of other issues that cause concern then Council believes the proposal should not proceed.	Typical locomotive types are outlined in the Noise and Air of the EA Report working papers in Appendices E & F. The use and availability of locomotives is a matter for the freight and rail operators and will be considered when the ILC commences operations. The appropriate approach to the management of effects from the rail freight line corridor is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	832	Strathfield Council **DoP Submission Nos 121 & 159**
Rail Issues	The current proposal allows for up to 20 shuttle train movements per day to and from Enfield. There is no guarantee that this will not increase in the future. This is in addition to the other rail movements predicted on this line. A total of 166 rail movements are predicted through this site by 2025. No documentation as to the types of traction engines to be used is given in the Rail Traffic segment of the Assessment. Documentation elsewhere is that it is proposed to use old style diesel electric locomotives, which do not meet current noise or emission requirements. It is possible to use modern electric powered locomotives, which will reduce noise and assist with the pollution issues in the Sydney Basin. Further, there is no discussion as to the maintenance requirements of infrastructure or rolling stock. Train Operations - No detail has been provided for rail network maintenance. The amount of downtime for the terminal due to track and related infrastructure maintenance has the potential to cause backlogs and associated vehicle / container storage deficiencies within the site. Strathfield Municipal Council request details of the proposed maintenance schedule and how any downtime for the rail link will be managed.	The ILC has been designed to allow up to 300,000 TEU per year. This will be achieved by up to 20 train movements. The throughput capacity of the ILC is not greater and therefore train numbers to and from the ILC would not increase. Typical locomotive types are outlined in the Noise and Air of the EA Report working papers in Appendices E & F. The use and availability of locomotives is a matter for the rail and freight operators. The appropriate approach to the management of effects from the rail freight line corridor is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. Rail maintenance issues will be determined with the cooperation of Rail Corp and ARTC.	832	Strathfield Council **DoP Submission Nos 121 & 159**
Rail Issues	In the EA it is stated that this growth would occur in any event because an alternative ILC would need to be developed to meet the Government's rail freight transportation objectives. However this statement is regarded as a "cop-out" because it ignores that the proposal is an essential part of the Government's freight strategy, and it will in itself contribute to the increased train movements.	Without the development of Enfield the Government's freight strategy objective of 40% of Port Botany containers moved on rail would still be achieved, but not within the same time frame.	816	Canterbury Council **DoP Submission Nos 157 & 162**

Rail Issues	Given the total, combined cost of development associated with an expanded Port Botany and an Enfield Intermodal Logistics Centre, it is not considered unreasonable that funds be committed for the purpose of properly mitigating the impacts of freight rail noise and vibration upon dwellings located near the freight rail line that connects the two facilities.	The appropriate approach to the management of effects from the rail freight line corridor is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor.	489	Marrickville Council **DoP Submission No 58**

Submissions Council: REJECT PROPOSAL

Issue Category	Comments	Response	Stakeholder ID	Name
Reject Proposal	Council objects to the DA and accompanying EA for the intermodal and requests to the Department of Planning (the consent authority) that the DA be refused. Council's position is that the development of the proposed ILC should not proceed because of the impacts that the development would have on the Strathfield local government area. The Enfield Intermodal proposal is not supported because: • the impacts of the 24 hour operation of such a facility will conflict with the after hour (night time) amenity of the neighbouring residential suburbs despite the current proposals to mitigate the impacts.	Noted. The potential for environmental and social impacts are assessed through various chapters of the EA and the conclusion that the project should proceed, subject to the implementation of mitigation measures expressed as statements of commitment.. The surrounding land use is predominantly industrial and access to the arterial road network is through this area. A Community and Ecological Area is proposed for the area opposite residential development along Cosgrove Road. The Local Area Traffic Management Plan to be prepared for the site will provide means to ensure that vehicles entering and leaving the site do not enter Punchbowl Road from Cosgrove Road, thus avoiding residential streets. A range of mitigation measures have been proposed to minimise the potential impacts from the 24 hour site operation.	832	Strathfield Council **DoP Submission Nos 121 & 159**

Issue Category	Comments	Response	Stakeholder ID	Name
Safety	No emergency incident management plan is evident to deal with Dangerous Goods and vehicles carrying dangerous goods. In the event of a major incident on the road network in the vicinity of the ILC a comprehensive Traffic Control Plan needs to be provided to demonstrate how the ILC propose to manage such an incident should it occur Over a five-year period, areas close to the proposed site have had a total of 1213 accidents with 6% involving heavy vehicles and 17% involving light commercial vehicles. Additionally there were 10 fatalities. The most noticeable accident locations are the Liverpool Rd (Hume Hwy) with 488 accidents and Roberts Rd with 282 both of which are considered critical roads for entry /egress to the proposed site. It would be fair to assume that with extra heavy vehicles in the locality this poses a risk for the accident levels to increase which is not acceptable Design to be based on Safer by Design principles. • Clear pedestrian entry to site. Preferably on northern side of Tarpaulin shed rather than near Punchbowl Rd to provide link to Major Open space corridor through Begnell Field. • Pedestrian Crossing on Cosgrove Rd with Traffic Calming features to allow safe access from residential area. Council does not support the proposal and would recommend that a full Road Safety Audit on both a Regional and Local level be undertaken in consultation with all local Councils in the catchment area as proposed by Sydney Ports	Potential pollutants during construction and operation would be managed in accordance with the construction and operation management plans. As discussed in Chapter 20 of the EA. An emergency incident management will be completed by Sydney Ports Corporation prior to the opening of the Intermodal Logistics Centre. See above The ILC will contribute a 1% overall increase to the traffic volumes on the road. There is no reason to expect a significance increase in accident rate. To be addressed as part of the detailed design phase. Strathfield Council was provided with 2005 intersection count data at all critical locations within the impact zone of Enfield ILC. A road safety audit is not considered necessary	832	Strathfield Council **DoP Submission Nos 121 & 159**
Safety	There is considered to be inadequacies with the risk assessment in the EA. The hazard identification summary does not list the hazard from diesel spills from locomotives. It also limits the consequence of a spill from the diesel storage tanks to a potential fire.	Due to te low shunting speeds of locomotives on the ILC site, diesel spills directly from incidents involving locomotives were not included in the hazard identification summary, as this is considered a hazard of very low risk potential. Any spills during refuelling of locomotives will be captured in spillage pits. Spills from the diesel storage tansk will be captured within the bund area around the tanks. Potentially such spills into the bunded area could result in a pool fire and the risk and impact of such a fire was analysed and given in the PHA in Appendix K of the EA. The impact zone for the damage from such fires was calculated to	816	Canterbury Council **DoP Submission Nos 157 & 162**

	The EA states the site would have the capacity to contain a spill of up to 20,000 litres. However each of the diesel tanks has a capacity of 25,000 litres. There needs to be certainty that in the event of a catastrophic failure of one or more of the diesel tanks the site has the capacity to prevent a spill leaving the site, particularly if this coincided with wet weather.	be 16m radius around the tank. This 20,000 L capacity relates to the first flush containment system and provides for general spills on site. Storage tanks are treated separately and detailed design would ensure that bunding facilities around each storage tank would be capable of storing 110% of the volume of the tank. This would also be addressed during preparation of construction and operation management plans. This would include the requirement for spill kits to be maintained on site.		
Safety	• Hazard Assessment. Given the complex nature of the hazard assessment and because it has an important bearing on public safety, it is considered prudent that the findings of the hazard assessment be peer reviewed by an independent expert prior to any approval being given to the proposal. Given the complex nature of the hazard assessment and because it has an important bearing on public safety, Council considers that the findings of the hazard assessment need to be peer reviewed by an independent expert prior to any approval being given to the proposal. HAZARD ISSUES Council is not necessarily disputing the findings of this assessment – we cannot due to its highly technical nature. However, given that this issue relates to public safety we believe that it needs a detailed technical review by experts in this field, and we request that it be peer reviewed, we consider this to be necessary for a number of reasons: • To confirm the assumptions made about the modelling (included in Chapter 6 of Appendix K). This is a critical issue because assumptions were made about the materials that are used in the facility, and the quantities of these materials have a bearing on the hazard identification, the consequences associated with a hazardous incident, and consequently on the calculation of the risk contours. It seems to us that assumptions that particular materials will not be transported through the site could be unreliable since unless there are restrictions on what materials can be transported then it is hard to see how assumptions that certain materials wont be put through the site are valid. Other assumptions should also be checked carefully, for example the impact of greater than assumed wind speeds on the results. • Need for a Sensitivity Analysis. Further in this regard, any review should include a sensitivity analysis, as this will allow the uncertainty regarding assumptions about particular materials and their quantities to be included in the calculation of risk contours;	This is an issue for Department of Planning.	815	Beveridge, Mr Martin (Bankstown Council) **DoP Submission Nos 164 & 328**

	Review of Findings of PHA. Given that this issue is directly relevant to public safety, we believe that all the entire calculations behind the PHA should be verified or peer reviewed by another expert in this field. Also, one specific point of clarification is requested. It is unclear whether the risk contours are calculated from individual events (eg individual instances of fire, explosion or release of toxic substances) or whether they are based on combined events. A precautionary approach would suggest that a combination of hazardous events (fire explosion and release of toxic substances) be considered as a single incident and risk contours calculated on this combined incident. This would provide a "worst case scenario, and only then (if the 1 - in a million individual fatality risk contour was contained on site could the proposal be considered safe in terms of risk. If the PHA has not included this "worst case" we believe it should be amended to include it. • Review of Mitigation Measures and Need for further Studies Hazard mitigation measures have been proposed. These should be peer reviewed for their suitability. Furthermore, the need for further hazard related studies should be considered In this regard it is also noted that the EAR only includes a preliminary hazard analysis. This is the first stage in the process of managing hazard that is advocated by the Dept of Planning. Other stages are also recommended, including such studies as a detailed hazard analysis, a Hazard and Operability Study (HAZOP) study, and an Emergency management plan. Whilst the EAR recommends the preparation of an Emergency.management Plan, consideration should also be given to whether a more detailed hazard analysis or a HAZOP study should be undertaken; until an appropriate peer review of the hazard assessment has been undertaken which addresses our concerns, Council is not convinced that the hazard issues have been adequately dealt with. CONCLUSIONS SAFETY • Hazard Assessment. Given the complex nature of the hazard assessment and because it has an important bearing on public safety, Council considers that the findings of the hazard assessment need to be peer reviewed by an independent expert prior to any approval being given to the proposal.			

Issue Category	Comments	Response	Stakeholder ID	Name
Socio Economic	The "Socio Economic Assessment" section of the Sinclair Knight Merz report for Sydney Ports Corporation goes to great lengths to consider identified social impacts and effects in order to endeavour to mitigate negative impacts on the immediate community, however, in most cases the scenarios are during the construction phase only. The findings need to be projected to the every day operation of the site on a day to day basis for the decades to come, not just the construction phase. The social impacts relate to the health and safety not only of the human communities adjacent to the site, but to communities in the nearby areas such as the sections of Strathfield north Liverpool Road. The report focuses on the nearby community in most cases and should be extrapolated to extend to the greater surrounding areas. The specific impact on schools within the local community has not been adequately addressed. This relates to local schools such as Strathfield South Primary School, Chullora Primary School, and particularly to Strathfield South High School which is located at the corner of Liverpool Road and Roberts Road to the northern end of the Enfield site. The impacts from truck movements, traffic congestion, air and noise pollution etc will potentially have a negative impact on the children and staff attending these schools. If approval is granted for the Enfield Intermodal Proposal, the following conditions should apply: • To overcome the community concerns surrounding the proposed Enfield Intermodal Logistic Centre further investigation is required to consider the full social implications of the day to day operations of the proposed development The proposed Light Industrial/Commercial Development along Cosgrove Road is not to be subject to the Local Government Act Section 600 Rate Rebate of 25%. These proposed developments would not be entitled to a rent rebate from Council due to Clause (3) (a) as this land has a frontage and access to Cosgrove Road and access is not substantially over lands for which the public body (Sydney Ports) provides. Strathfield Council does not currently levy Section 94 contributions from Industrial developments. However the proposed development will be subject to section 94 contributions should Council decide to levy Section 94 contributions from Industrial developments as part the 2006 five year review of Strathfield Council's Section 94 Plan. However considering the size and impact of this	In the majority of development potential impacts are most significant during the construction phase. Potential impacts during operation would be managed through the Operation Environment Management Plan. Details of the mitigation measures for noise and air quality are addressed in Chapters 11 and 12. Traffic in Chapter 7. See above comment There are no specific impacts on schools in the area. The assessment of impacts from truck movements, traffic congestion, air and noise pollution indicate that there would be no significant impacts in these areas from the operation of the proposed ILC. No further social impact assessment is required. The Operational EMPs prepared for the site will address issues of traffic, noise and air pollution leaving the site and the ways in which these issues can be further mitigated. Noted Noted	832	Strathfield Council **DoP Submission Nos 121 & 159**

	proposed development, specific contributions on annual basis (in addition to Section 94 & the Community /Ecological Area) should be made for local community benefit. Council will be able direct these contributions or outline specific projects that can be delivered by Sydney Ports in line with Councils identified planned community and recreational facilities in the south Strathfield area (eg from the Strathfield Recreational & Cultural Needs Study 2006). It is recommended that on-street parking on the southern side of the eastern arm of Norfolk Road be prohibited for a distance of 50m. This restriction would have an impact on the businesses fronting this section of Norfolk Road and alternative arrangements for their staff and customers would need to be made.	Banning parking for this length could improve intersection operation. Alternative parking arrangements could be incorporated into the detailed design for the intersection and would be subject to further considered during preparation of the Local Area Traffic Management Plan and the redesign of the Norfolk Rd / Roberts Rd intersection.		
Socio economic	It would reasonably be expected that residents of Bankstown would be involved in some of these jobs as a result of this facility, and Council acknowledges the positive socio-economic effect that this would have on the Bankstown community.	Noted.	815	Bankstown City Council **DoP Submission Nos 164 & 328**

IssueCategory	Comments	Response	StakeholderID	Name
Support Proposal	Bankstown City Council supports, in principle, the freight strategies outlined within the paper entitled "Railing Port Botany's Containers" prepared by the Freight Infrastructure Advisory Board (FIAB). This includes the proposition for a network of intermodal terminals within western and south western Sydney to increase the amount of freight moved by rail. In this context, Council recognises and is supportive of the important role that the proposed terminal at Enfield would fulfil as part of this network. Nevertheless, Council is concerned that the EAR for the proposed freight terminal has not demonstrated that, in view of the scale of the facility and its 24 hour operational requirements that it can operate in an acceptable manner, and without significant impacts upon the residents of Bankstown, particularly in the suburb of Greenacre. Whilst Bankstown Council supports the objectives behind the establishment of the facility, we consider that-modifications are required on these matters (traffic, noise, air quality light spill) before we are satisfied that the facility will operate in an environmentally acceptable manner. We also consider that there is a requirement for detailed conditions of consent to be included (including provision for monitoring of these conditions, perhaps by a Consultative Committee consisting of representatives from affected Councils, Sydney Ports and the Department of Planning) before Bankstown Council can be confident that the proposal can operate satisfactorily.	Noted. Construction and Operation Environmental Management Plans are proposed to minimise identified impacts. Mitigation measures are to be further explored during detailed design. Noted. The Project Environmental Management Plan would provide a means of ensuring compliance and monitoring of compliance with the conditions of consent.	815	Bankstown Council **DoP Submission Nos 164 & 328**

Submissions Council: TARPAULIN FACTORY

Issue Category	Comments	Response	Stakeholder ID	Name
Tarpaulin Factory	The Tarpaulin shed provides the possibility of becoming a valuable community facility subject to repair, restoration and conversion; this may include consideration of partial relocation and demolition to improve the practicality and benefit of the facility.	Management options for the Tarpaulin shed are to be further investigated as part of the detailed design phase. Council, the community and the heritage Office will be involved in the decision as to the future of the structure.	832	Strathfield Council **DoP Submission Nos 121 & 159**
Tarpaulin Factory	It is feasible to relocate one or both sections of the state significance former Tarpaulin Factory without substantial loss of significance particularly as it is a reassembled building. Restoration and repair to be completed by Enfield ILC. Conversion to community facility should also be undertaken at the cost of Enfield ILC. Investigation of the possibility of relocating the eastern section of Tarpaulin shed to another site, providing space for limited parking and landscaping to the road frontage. • Removal of contaminants such as lead or asbestos, gas bottles and rubbish. • Used for multiple community purposes such as community centre, youth centre or indoor sporting facility as per the recommendations of the Strathfield Recreation Plan currently under development. • Tarpaulin Shed design should incorporate views and access to the Community + Ecological Area. • Tarpaulin Shed will require Soundproofing to allow use for community purposes. • Parking must be considered depending on future use. As noted in the GBA report, the building has been relocated previously and could be disassembled and rebuilt in a location where access can be better arranged. Ideally, this should be within the proposed Intermodal Logistic Centre development so that its relationship to the former Enfield Marshalling Yard is retained. The building has limited potential for re-use for commercial or community groups due to the difficulty of providing vehicular access to the site and the isolation of the site from other community facilities. With limited use options, the building is likely to become a financial burden on the community. Considering the high significance of this building, strategies for the potential re-use of this building that better address access, community needs and desires and future maintenance issues need to be developed. Specific guidelines for the Tarpaulin Factory for the potential re-use of this building that better address access, community needs and desires and future maintenance issues should be provided prior to its re-use and/or relocation. It is feasible that this building can be relocated without substantial loss of significance, subject to an appropriate location being found.	Reuse options for the Tarpaulin Factory will be further investigated as part of the detailed design phase of the project. The Tarpaulin Factory will be stabilised against further deterioration and, in consultation with the Heritage Office and the community, options for its reuse at its present site will be investigated. Only if on-site reuse is found to be unachievable will consideration be given to its relocation off-site to a railway heritage museum or demolition.	832	Strathfield Council **DoP Submission Nos 121 & 159**

Issue Category	Comments	Response	Stakeholder ID	Name
Traffic	Sydney Ports proposal of relieving road congestion by transferring freight by rail is seriously flawed as in excess of 60% of all goods arriving by rail will still require to be transported by road. This questions the ability of the proposed ILC to operate effectively and efficiently without utilising the road network that is currently over capacity and operating at level of service, which is unacceptable. Extension of the proposed Cycleway from Begnell Field through bridged across the site to Wentworth Rd, Greenacre should be considered to increase access to the population in Greenacre isolated by the facility and railway lines.	The kilometres travelled by trucks associated with the movement of the 300,000 TEU to/from the Enfield ILC would be 68% less than if those same trucks were moving the 300,000 TEU to/from Port Botany. This is a substantial reduction in the demand placed on the road network. SPC is not proposing any off site bicycle paths	832	Strathfield Council **DoP Submission Nos 121 & 159**
Traffic	SKM's report also outlined observations that many of the smaller freight companies with limited facilities working on a tight budget (eg owner drivers) were less likely to use freeways or motorways due to the payment of tolls. These vehicles would then find an alternative route via local streets. This problem needs to be considered and appropriate measures put in place in relation to the proposed site at Enfield. The scale of traffic impact on Enfield and surrounding suburbs is unacceptable. No consideration or reference has been made to the proposed M4 East project and the local traffic impact that may be generated Council strongly disagrees with the recommendation that the Roberts Rd / Norfolk Rd intersection is operating with spare capacity at level of service B and requires no enhancement. We suggest that this intersection is already over saturated with current traffic volumes currently at level of service F and requires complete re-construction and re- modelling to include SCATS modifications.	The modelling takes into account the value of travel time savings of drivers and how this translates into acceptable toll values for the time saved. There are alternative arterial routes available should truck drivers not wish to pay tolls on the M4 or M5. Enfield ILC contributes less than 1% of the overall traffic onto the local network. The scale of the traffic impact of the ILC therefore is not considered to be substantial. The M4 East was not considered as the proposal has not been endorsed by the NSW Government. Our traffic counts indicate that the average delay for all vehicles at this intersection is 20 seconds in both the AM and PM peak hours. While the average delay on some movements may be high at this intersection, the average delay on others would be minimal, resulting in an acceptable overall level of delay. Our analysis is presented in the report which states that the Roberts Rd/Norfolk Rd intersections operate at an acceptable level of service.	832	Strathfield Council **DoP Submission Nos 121 & 159**

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	B-double vehicles to use Wentworth St and Norfolk Rd. With this in mind, Norfolk Rd is approved only for use by 23m B-doubles and Wentworth St is not approved for B-double use.	use by 23m B-doubles between Roberts Road and Metro Smallgoods. It would be appropriate to extend the approval to the ILC entry.		
	It is unlikely that Council would approve Wentworth St for B-double use in the short term due to issues related to alignment and pavement capacity	Council and the RTA have previously (June 2005) undertaken tests with 25m B-doubles at Roberts road/Norfolk Road. The testing indicated a problem with the left turn into Norfolk Road. This turn would be possible with intersection improvements (i.e. a splayed intersection approach-left turn in from Roberts Road) Council indicated no problems with other movements at this intersection with a 25m B-double.		
	Section 138 of the Roads Act provides for the Road Authority to approve access to its roads. There is no provision for an application to Council for any access to Wentworth St. Council would not normally approve this access, as there are already a number of access points to this site. Council needs to have the ability to approve the proposed bridge alignment in terms of grade and site distance.	An application for access to Wentworth Street will be submitted at the appropriate time. Council will be consulted over the access and the bridge design, although as this is a Major Project, Council's approval may not be withheld.		
	The proposed development of Cosgrove Rd should be accessed from internal roads and not directly onto Cosgrove Rd	Access to the sites proposed for Cosgrove Road will be subject to separate approvals.		
	Additionally, with a large increase of heavy vehicles, no consideration has been given to the capacity of local service stations in the locality to allow B double trucks to refuel and re-enter the road network in a safe manner	Vehicles will not have to refuel at local stations.		
	Access and egress to / from the site is being directed to intersections already over capacity with current traffic volumes which generally tends to create "Rat-Runs" through residential streets	Enfield ILC contributes only a marginal increase to the volumes of traffic on the road network. The ILC will develop LATM measures, in consultation with the RTA and Councils to deter ILC trucks from using residential streets.		
	There is a severe lack of public transport facilities to cater for the future employees should the proposal go ahead.	The shift workers are unlikely to use public transport due to shift hours. There are some bus routes which serve the site for other employees but these are unlikely to be heavily used. Parking will be provided on-site for all employees.		
	Rail Infrastructure Corporation claims the proposal	Noted. This road transport growth is		

	will provide certainty for rail industry to plan for future business growth without any consideration or acknowledgement that more road transport will be required to achieve any growth	correspondingly diminished with the increased use of rail transport.		
	No downtime for track maintenance is highlighted with proposed rail operations running 24 hours per day 365 days per year. Council would request confirmation that further road movements will not occur during rail maintenance periods	In the proposed typical operation scenario, maintenance is assumed to take place between 3am-5am and therefore no truck movements occur to access the ILC (see EA Report section 4.2.1 of Appendix B).		
	SKM reports that construction staff traffic impact is not considered to be significant. At peak time up to 240 staff will be employed plus 75 construction vehicles daily. The closest train stations are 2.3 km away and the bus service does not adequately service the site. Based on this, it may be safe to assume that private vehicles will be used and therefore parking facilities will need to be considered despite SKM's analysis	The movement of all 240 staff within the network peak hour is a worst case scenario, and it would be likely that there would be some spreading of arrivals and departures. SPC propose to cater for all parking on-site. The requirement for parking has been discussed within the EA in Section 3.6.1 of Appendix B. The actual parking arrangements would be addressed as part of the detailed design stage.		
	In addition to the above paragraph parking remains a concern as it has been advised that up to 450 people will be employed on site when operational and unfortunately no concrete evidence of parking facilities are provided apart from saying that all vehicles will be accommodated on site. Council would like to see confirmation of an internal traffic management plan which will deal with all issues and a standard operating procedure for all lessees / operators within the site.	EA report Section 3.3.7 of Appendix B states that a total of 378 persons working on-site during a total workday, with 291 during the day and 87 during the night. Parking will be provided on-site for all employees. A traffic management plan will undertaken as part of the concept / detailed design stage.		
	Insufficient documentation have been made available regarding the investigation of alternative entry / exit points to the proposed site. Consideration should be give to the possibility of linking Gould St to the existing internal road within the site	Several access points have been considered and thoroughly documented by Sydney Ports Corporation. This was summarised in the EA.		
	Heavy vehicle movements are only anticipated at this stage. Council would like to see a proper schedule of truck movements due to the fact that the current proposal anticipates that only 6% of vehicle movements will occur between 2200hrs and 0600hrs. As this anticipated number is so low, we suggest a curfew be imposed from 2200hrs to 0600hrs to minimise noise levels for residents in the municipality	A likely daily profile of on-site truck activity is shown in Figure 7-4 of the EA document. This shows that approximately 13% of the vehicle movements occur between 10pm-6am. Note that between 3am-5am there are no truck movements anticipated. Freight movements require flexibility in operating hours to receive/deliver containers to customers requirements. Noise impacts are discussed in EA report Ch 11.		

	Consultation with the RTA for the provision of a weighbridge and over height detection equipment to monitor the additional 1160 heavy vehicles daily utilising the proposed facility. This may be necessary prior to heavy vehicles entering the road network.	Noted. The RTA has requested SPC to develop a HVMP which requires ILC operators to adhere to relevant road regulations.		
	The assessment area is too localised due to the large amount of heavy vehicles concentrated in an area already over saturated. The "knock on effect" to this will have an enormous impact on a regional scale and subsequently overload local roads already struggling to compete with major arterial roads.	The area used in the traffic impact assessment is considered acceptable given the low volumes of additional trucks onto the arterial road network. Outside the study area, the impact becomes negligible. The ILC contributes less than 1% to overall traffic volumes on the adjacent arterial road network. Source: Fig 4-3 and 4-4 of Appendix B.		
	The increase in the degree of saturation on Roberts Rd / King Georges Rd corridor will change the travel patterns of many motorists, adding to network wide congestion.	The level of congestion in the Roberts Road corridor is taken into consideration in the network modelling. The future modelling includes the changes in route that might eventuate due to congestion in this corridor.		
	Whilst it is agreed that road improvements will be required at intersections, clearer presentation of all road improvements is required with confirmation of financial costing and contributions towards upgrading and all traffic facilities	SPC will provide further information at the detailed design stage once conditions of consent are known.		
	Full consultation should take place with Council and the RTA with a view to re-classifying Wentworth St and Norfolk Rd to a state Highways whereby the RTA would assume full responsibility.	This is a matter to be discussed between Council and the RTA.		
	With increased truck movements programmed, council would suggest that the proponent conduct a full analysis of noise levels to include projected levels. This should meet with the EPA's Environmental Criteria for Road Traffic Noise standards.	A Noise Impact Assessment has been considered as Chapter 11 of the EA and in Appendix E. This issue has been addressed in response to DEC submission.		
	SKM's report that the peak period on the network is generally between 0700hrs - 0900hrs and the afternoon peak period is between 1600hrs and 1800hrs. This is a general assumption Sydney wide but does not apply to this geographic location.	24-hour profiles for Roberts Road, Hume Highway and Georges River Road (from 7 day tube counts) indicate that the peak hour is the same as reported. This is also a general Sydney wide assumption and an RTA guideline.		
	Traffic counts confirm that many of the critical	The peak period was analysed in terms of traffic		

	intersections pertinent to this proposal carry significant volumes of traffic outside the hours quoted. An example of this is the intersection of Roberts Rd and Norfolk Rd carried 4309 vehicles per hour at 1400hrs and 4708 vehicles per hour at 1500hrs on Friday 18th November 2005 respectively. Considering these volumes and the documented peak period for truck movements from the ILC is 1430hrs with 103 movements, this in my mind considerably flaws the efficient and effective movement of heavy vehicles both to and from the proposed site.	impact of the proposed development. The survey data from the tube counts indicate that this is the peak period which should be considered for overall network performance i.e. analysed worst case analysis which is consistent with RTA's requirements.		
	The proponent's data with regard to traffic counts /volumes is questionable.	The intersection survey counts were undertaken by an independent survey company in February 2005. These surveys were undertaken over 24 hours / 7 days per week.		
	A number of intersections have been omitted which this council deems critical to optimal traffic flow in the area.	The intersections analysed were considered to be the most critical to the impact assessment. A meeting was held with the RTA where additional intersections were requested and assessment undertaken by SKM. The low levels of traffic generated by the ILC(less than 1% of overall traffic on the adjacent arterial road network) do not warrant wider investigation. The increase in background traffic growth is the main impact on local network performance.		
	` Whilst it provides a glossy picture to produce statistics of traffic volumes running in an East - West direction, it is a far more sensible approach to traffic management to look at the "full picture" and therefore provide ALL details for traffic counts at the given intersections. I have taken the liberty of outlining data collected in November 2005, which in Councils opinion puts serious doubt into the accuracy of the volumes provided. It should also be noted that November is predominantly a reasonably quiet month in relation to traffic movements with March usually being the busiest month of the year. See table overleaf for confirmation:	2005 surveyed intersection counts were provided to Strathfield Council. The source of the Council count data is unknown. According to RTA annual data for Roberts Road and Hume Highway, November is one of the busiest months of the year in terms of daily volumes. February is more representative of average conditions.		
	Council believes that the following intersections are considered critical to traffic operations in the area and have not been assessed by SKM in their proposal. - Hume Highway/Waterloo Road	Hume Highway/Waterloo Road was analysed in the studies for the previous proposal in 2001. The LoS at this intersection was A. It was not considered that conditions have significantly The intersections analysed were discussed with the		

	- Liverpool Road/Homebush Road - Arthur Street/Richmond Road	RTA Liverpool Road / Homebush Road – this intersection is to the east of the proposed site. The traffic distribution shows that approximately 1 HGV will use this intersection from the site and therefore not considered to be adversely impacted by the ILC – i.e. the market / destination is to the west of the site Arthur Street / Richmond Road – No vehicles from the ILC are anticipated to use this junction and therefore it has not been considered		
	The Enfield Intermodal Proposal is not supported and should not proceed because: • Traffic Data provided by the proponent significantly underestimates the current road network performance, which in turn will also have an impact on air quality, noise and accident data	The intersection survey counts were undertaken by an independent survey company in February 2005. SKM believes that they do not significantly underestimate the current road network performance during peak times. The air quality and noise assessment were carried out and documented in the EA. Accident data was sourced from the RTA.		
	• The proposal submitted is too localised and a full Road Safety Audit on both a Regional and Local level should be undertaken in consultation with all local Councils in the catchment area	The local and adjacent regional impacts were taken into consideration. A Road Safety Audit is not considered necessary.		
	• Local area traffic management measures for Cosgrove Rd and surrounding streets be further investigated to optimise the access / egress arrangements to the proposed site • The proponent recommends that a number of intersections be upgraded. Council supports this recommendation but would suggest that the re-construction required take place prior to any approval being granted	Local area traffic management measures will be considered for Cosgrove Road to prevent vehicles travelling southbound from the site or entering the site from Cosgrove Road when travelling northbound. The traffic conclusions indicate that intersection performance is diminished even without the development of the ILC. Intersection upgrades are a matter between Council and the RTA		
	• The intersection of Roberts Rd and Norfolk Rd needs to be completely reconfigured considering it is expected to carry approximately 75% of the traffic generated by the proposal	SKM analysis shows that this intersection has spare capacity in terms of overall intersection performance. Council and the RTA have previously (June 2005) undertaken tests with 25mB-doubles at Roberts Road/Norfolk Road. The testing indicated a problem with the left turn into Norfolk Road. This turn would be possible with intersection improvements (i.e splayed intersection approach-left turn in form Roberts Road). Council indicated		

		no problems with other movements at this intersection with a 25m B-double. The other two intersections mentioned (Roberts Rd/Juno Pde and Hume Highway/Cosgrove Rd) are already approved to provide appropriate access fro 25m B-doubles. SPC has agreed with the RTA that this intersection will be enhanced to improve traffic flow including B –double movements i.e. SPC to consider a left turn slip lane to improve access to the ILC.		
	• A full pavement condition audit is undertaken, of all roads affected by the proposal, to assess the capacity of these roads to carry the proposed vehicle loadings in terms of both numbers and weight	A pavement condition survey was undertaken and is included in the EA – See Appendix B.		
	• Section 138 of the Roads Act provides for the Road Authority to approve access to its roads. There is no provision for an application to Council for any access to Wentworth St. Council would not normally approve this access, as there are already a number of access points to this site. Council needs to have the ability to approve the proposed bridge alignment in terms of grade and site distance.	An application for access to Wentworth Street will be submitted at the appropriate time. Council will be consulted in the detailed design phase over the access and the bridge design. Based on operational requirements, existing agreements with RailCorp and known on site and off site constraints (including the New Marshalling Yards), the final location of the bridge will most likely not vary more than 20m either side of its current identified landing point.		
	• The proposed development of Cosgrove Rd should be accessed from internal roads and not directly onto Cosgrove Rd	Access to the sites proposed for Cosgrove Road will be subject to separate approvals		
	• Establish an Intermodal further to the west of Sydney, which is the targeted area and final destination for over 60% of the freight passing through the proposed Enfield site.	Separate studies by SPC confirmed the inner and middle western areas of Sydney as the market catchment for up to 56% of in-bound containers. The need for the ILC to service this area was confirmed in the FIAB report, a component of the Metropolitan Intermodal Freight Strategy. This will contribute to the NSW Government's goal of moving 40% of Port Botany containers on rail.		
	A traffic management plan (TMP) shall be submitted to and approved by Council for all demolition, excavation and construction activities associated with the development taking place and prior to the issue of a Construction Certificate.	A Construction Traffic Management Plan would be prepared prior to construction commencement taking into consideration the required demolition, excavation and construction activities.		

	Vehicular access points to site shall comply with the requirements of Council and RTA prior to the issue of a Construction Certificate.	Noted.		
	All redundant vehicular crossings shall be removed and replaced with kerb and gutter and footpath at no cost to Council. Reconstruct the footpath, road shoulder kerb and gutter to Council's specifications for the full frontage of the development site at the completion of all building works.	To be addressed during detailed design and construction		
	Any reduction in truck movements claimed by the report as a result of freight trains coming to Enfield will be severely offset by a dramatic increase in localised truck movements entering and leaving the facility to distribute the freight once it has been offloaded from the trains.	The analysis shows that the reduction in overall vehicle kilometres travelled (VKT) of 6.5 million VKT results in a saving of 250,000 truck movements between Port Botany and Enfield and a saving of 100,000 truck movements from Port Botany to final origin / destination within the ILC market area. 100,000 truck movements are internalised because of the integration of warehouse facilities on site with the intermodla terminal and empty container storage.		
	The modelling of air quality impacts from road traffic and the conclusion that no exceedances or significant impact will result from road traffic are therefore seriously questioned.	The traffic and air quality impacts are addressed in Chapter 7 and 12 of the EA. The traffic data provided for these assessments were adequate and appropriate.		
	SKM's Final Transport Working Paper concludes that "where the heavy vehicle volume increases, it is generally only by a small margin. In most cases, the change in peak hour traffic volume is negligible." Whilst this is true, the NETANAL model significantly underestimates the current level of congestion on the regional road network and the fact that even a small increase in the number of heavy vehicles will have a major impact on the operation of the regional roads in the area, and the operation of the local roads connecting to them.	Independent counts were undertaken to calibrate the base model. The model was verified and calibrated – See Appendix C of the full Transport Working Paper (Appendix B) in the EA. The results of the calibration process show that the model used is acceptable for this analysis – and the model updated to reflect existing conditions. The area of impact was discussed with the RTA		
	The assessment area used is too small to enable the evaluation of the network wide implications of this proposal.	The assessment area is considered to be adequate. The ILC volumes generated are low and generate less than 1% of overall traffic on the adjacent arterial road network.The area of impact was discussed with the RTA.		
	The disbenefits this proposal has on the area around Enfield may not be outweighed by the benefits to the	Separate studies by SPC confirmed the inner and middle western areas of Sydney as the market		

	road network around Port Botany. It is, therefore, necessary that this proposal be considered within the framework of metropolitan wide freight transport strategy.	catchment for up to 56% of in-bound containers. The need for the ILC to service this area was confirmed in the FIAB report, a component of the Metropolitan Intermodal Freight Strategy. This will contribute to the NSW Government's goal of moving 40% of Port Botany containers on rail.		
	At present the primary objective appears to be the perceived achievement of rail transport targets when the reality is that the rail component of freight trips will be only 18 kilometres in length and the majority of the total transport trip continues to be being carried out by the same congested roads that are currently used. Surely the primary objective of any rail freight transport strategy should be to relieve congestion on the road network.	The kilometres travelled by trucks associated with the movement of the 300,000 TEU to/from the Enfield ILC would be 68% less than if those same trucks were moving the 300,000 TEU to/from Port Botany. This is a substantial reduction in the demand placed on the road network.		
	M7 and M4 East Motorways - SKM's Final Transport Working Paper fails to consider the impact of the recently opened M7 Motorway and the proposed M4 East. Although the M7 Westlink Motorway is likely to have a greater influence on cross regional freight movements, some trip reassignment will inevitably occur due to the improved travel times available via this route. The M4 East proposal will have a much greater influence on the region surrounding the Enfield site. In particular, it will provide direct access via the Cross City Tunnel, Anzac Bridge, and City West Link to Port Botany with the potential for major travel time reductions for freight movements to and from the inner west of Sydney.	The M7 was included in the model. The proposed M4 East was not considered as the proposal has not been endorsed by the NSW Government.		
	The current geometry of the intersection is only suitable for B-Doubles to enter from the south and exit to the north. With the exception of the northbound right turn from Roberts Road into Norfolk Road and the right turn movement from the eastern side of Norfolk Road, all other movements provide inadequate turning paths for B-Doubles. The modelling conducting by SKM indicates that the dominant movement of HGVs to and from the proposed site will be to the north and northwest. The volume of traffic and level of congestion on Roberts Road will inhibit the ability of long vehicles to safely make wide turns in order to enter from or exit to the north.	Council and the RTA have previously (June 2005) undertaken tests with 25m B-doubles at Roberts Road / Norfolk Road. The testing indicated a problem with the left turn into Norfolk Road. This turn would be possible with intersection improvements (i.e. splayed intersection approach-left turn in form Roberts Road). Council indicated no problems with other movements at this intersection with a 25m B double. The other two intersection (Roberts Rd / Juno Pde and Hume Highway / Cosgrove Rd) are already approved to provide appropriate access for 25 m B-doubles. SPC has agreed with the RTA that this intersection will be enhanced to improve traffic flow including B - double movements i.e. SPC to		

		consider a left turn slip lane to improve access to the ILC		
	Rather than the lack of need for intersection enhancement concluded in the SKM report, it is recommended that the intersection of Roberts Road and Norfolk Road be completely reconfigured in order to adequately meet the needs of this proposal.	No upgrade is necessary to allow for adequate signal operation. However, as stated in Chapter 7 of the EA, this intersection will be enhanced to improve traffic flow. See above.		
	On-street parking in the kerbside lane to within 10 metres of the intersection prevents any left turning vehicles accessing the stopline when a long vehicle is held at the stopline in the right hand lane. These two issues combined results in a residual queue being generated which was observed to extend beyond the intersection of Norfolk Road and Wentworth Street. As the number of vehicles, and the proportion of long vehicles, increases as a consequence of this development, this problem will be exacerbated.	The removal of on-street parking on the approaches to the intersection would be considered as part of the detailed design process for the intersection. See comment above		
	Wentworth Street is currently a local road, however, under this proposal it would become the primary access point to the Enfield Intermodal Logistics Centre and carry a significant increase in heavy goods vehicles. Moreover, a large proportion of those HGVs would be long vehicles, specifically B-Double in classification. Wentworth Street was neither designed nor built to withstand the burden of this increased demand.	Wentworth Street is already heavily used by large vehicles, and is approved for use by 23m B-doubles. The surrounding land use is industrial, with many heavy-vehicle generating developments already in place. The use of Wentworth Street by the ILC is consistent with current usage of this road.		
	From the SKM report, Wentworth Street "south of Mayvic Street has deteriorated and the pavement needs rehabilitation in addition to upgrade works (widening). Although a detailed survey has not been conducted as apart of this review, the on-site inspection indicated that the current radii of the intersection Wentworth Street and Norfolk Road are not adequate to cater for long vehicles, in particular B-Doubles	Council and the RTA have previously (June 2005) undertaken tests with 25m B-doubles at Roberts Road / Norfolk Road. The testing indicated a problem with the left turn into Norfolk Road. This turn would be possible with intersection improvements (i.e. splayed intersection approach-left turn in form Roberts Road). Council indicated no problems with other movements at this intersection with a 25m B double. SPC has agreed with the RTA that this intersection will be enhanced to improve traffic flow including B - double movements i.e. SPC to consider a left turn slip lane to improve access to the ILC. Council indicated no problems with other movements at this intersection.		

	Cosgrove Road / Punchbowl Road - The SKM report identifies the residential land use on the southern end of Cosgrove Road, however, other than a superficial comment that heavy vehicles should be routed away from this area there is no firm proposal of how this would be managed. This issue is particularly important given the fact that the aaSIDRA analysis currently shows the intersection of Cosgrove Road and the Hume Highway as being oversaturated with conditions deteriorating over time. The temptation of users of the Enfield ILC to seek alternative access and egress points from the site would be significant. Therefore, the proponents should detail proposals for the management traffic in Cosgrove Road and give consideration to its closure at its intersection with Punchbowl Road.	Local area traffic management measures for Cosgrove Road will be considered during detailed design to prevent large vehicles travelling south on Cosgrove Rd. No intersection improvements are being considered for the Cosgrove Road/Hume Hwy intersection. Trucks will be monitored and controls implemented to prevent trucks, entering and leaving the ILC site, using Cosgrove Road south. However, heavy vehicles currently use this road to access the industrial land uses along Cosgrove Rd . Truck access to the residential area east of Cosgrove Rd is limited by the chicane in Madeline Street and Blanche Street being one-way westbound.		
	Public Transport - Given the poor access to public transport for workers at the site and their likelihood of using their own vehicles to travel to and from work, Strathfield Municipal Council, requests more detailed proposals of on-site parking provisions for private vehicles.	On-site parking will be provided for all employees at the site. The requirement for parking has been discussed within the EA in Section 3.6.1 of Appendix B. The actual parking arrangements would be addressed as part of the detailed design stage.		
	It is suggested that the "Final Transport Working Paper - Operational Traffic Impact Assessment" conducted by Sinclair Knight Merz significantly underestimates the current performance of Roberts Road and its intersection with Norfolk Road. Their conclusion that "the Roberts Road / Norfolk Road is operating with spare capacity and no intersection enhancement is required" does not reflect the current traffic conditions and the impact that this development will have on its operation. Given that this intersection will carry the stated "approximately 75%" of the traffic generated by this proposal it is critical that the identified deficiencies be rectified before the development is allowed to proceed.	Our traffic counts and analysis indicate that the average delay for all vehicles at this intersection is 20 seconds in both the AM and PM peak hours. While the average delay on some movements may be high, the average delay on others would be minimal, resulting in an acceptable overall level of delay. Our analysis is presented in the report which states that the intersections operate at an acceptable level of service. Norfolk Rd/Wentworth St is approved for use by 23m B-doubles between Roberts Road and Metro Smallgoods. It would be appropriate to extend the approval to the ILC entry. Councils and the RTA have previously (June 2005) undertaken tests with 25m B-doubles at Robert Rd/Norfolk Rd. This turn would be possible with intersection improvements (i.e splayed intersection approach- left turn in from Roberts Rd). Council indicated no problems with other movements at this intersection with a 25m B-double. SPC has agreed with the RTA to enhance the intersection to improve traffic flow for		

		B-double movements.		
	Extension of the proposed Cycleway from Begnell Field through bridged across the site to Wentworth Rd, Greenacre should be considered to increase access to the population in Greenacre isolated by the facility and railway lines.	SPC is not proposing any off site bicycle paths		
	If approval is granted for Enfield ILC the following conditions should apply.	Noted.		
	- Wentworth St and Norfolk Rd be re-classified to State Highways and that the RTA assume full responsibility for these	This is an issue between the RTA and Council.		
	- A full Road Safety Audit on both a Regional and Local level should be undertaken in consultation with all local Councils in the catchment area	A Road Safety Audit is not considered necessary at this stage.		
	- A full pavement condition audit is undertaken, of all roads affected by the proposal, to assess the capacity of these roads to carry the proposed vehicle loadings in terms of both numbers and weight	A pavement condition study was undertaken and is included in the EA – See Appendix B.		
	- The proponent recommends that a number of intersections be upgraded. Council supports this recommendation but would suggest that the re-construction required take place prior to any approval being granted	The intersection upgrades are likely to be required even without the development of the ILC. This is an issue to be discussed with the RTA and Council.		
	- The intersection of Roberts Rd and Norfolk Rd needs to be completely reconfigured considering it is expected to carry approximately 75% of the traffic generated by the proposal	SKM analysis shows that this intersection has spare capacity in terms of overall intersection performance It is proposed in Chapter 7 of the EA that this intersection is improved. SPC propose to improve the intersection to cater for B-doubles to negotiate the left turn lane from Roberts Road into Norfolk Road.		
	- The suggestion that the RTA investigate options to improve the operation of Centenary Drive and Arthur St be supported	Noted		
	- Local area traffic management measures for Cosgrove Rd and surrounding streets be further investigated to optimise the access / egress arrangements to the proposed site	Local area traffic management measures are being considered for Cosgrove Road south and the Norfolk Road / Roberts Road area.		

	- The proponents recommendation for widening the Hume Highway be supported	Noted.		
	- Review the possibility of linking Gould St to Cosgrove Rd - Review the possibility of linking Gould St to the existing internal Road within the proposed Site	Several access points have been considered and thoroughly documented by Sydney Ports Corporation. This was summarised in the EA.		
	- Liaise with the RTA regarding signal-phasing adjustments for all critical intersections within close proximity to the proposed site to maximise the road network efficiency	The RTA is responsible for the operation of the intersections and the optimal signal timing. SPC will liaise with the RTA as part of the Traffic Working Group to optimise the future performance of the intersections		
	- The application calls for significant numbers of B-double vehicles to use Wentworth St and Norfolk Rd. With this in mind, Norfolk Rd is approved only for use by 23m B-doubles and Wentworth St is not approved for B-double use. It is unlikely that Council would approve Wentworth St for B-double use in the short term due to issues related to alignment and pavement capacity	Norfolk Road / Wentworth Street is approved for use by 23m B-doubles between Roberts Road and Metro Smallgoods. It would be entirely appropriate to extend the approval to the ILC entry.		
	It is recommended that the traffic signal phasing (Roberts Road and Norfolk Road) be altered to eliminate the current filter right turn movement from the eastern arm of Norfolk Road by providing a controlled right turn movement. Although the overall "lost time" of the intersection will consequently increase, the gains in efficiency of the side road movements will more than outweigh the disbenefits.	A separate Right Turn phase has been analysed using INTANAL. This improves egress from the ILC but has a negative effect on the performance of the intersection. SPC will discuss the intersection operation with the RTA during the detailed design stage.		
	It is recommended that the intersection of Norfolk Road and Wentworth Street be surveyed and a Road Safety Audit conducted to ensure that long vehicles can safely negotiate the corner without crossing to the wrong side of the road.	Norfolk Road/Wentworth Street is approved for use by 23m B-doubles. Swept path analyses were undertaken subsequent to the submission of the EA. In addition, Council and the RTA has previously (June 2005) undertaken tests with 25m B-doubles at Roberts Road / Norfolk Road. The testing indicated problems with the left turn into Norfolk Road. SPC expects this left turn will need to be re-configured. Council indicated no problems with other movements at this intersection.		
	Given the significant amount of upgrading and on-going maintenance required it is recommended that Wentworth Street be reclassified as a State	This is an issue between Council and the RTA.		

	Road and become the responsibility of the Roads and Traffic Authority, NSW.			
	The on-street parking on the southern side of the eastern arm of Norfolk road approaching Roberts Road detrimentally affects the efficiency of the intersection. It is recommended that on-street parking on the southern side of the eastern arm of Norfolk Road be prohibited for a distance of 50m.	Banning parking for this length would improve intersection operation. Alternative parking arrangements could be incorporated into the detailed design for the intersection. This will be further assessed when the intersection is designed		
	<u>Centenary Drive / Arthur Street -</u> It is recommended that the suggestion that the RTA investigate options to improve the operation of Centenary Road and Arthur Street be supported as the performance of this intersection will deteriorate in line with growth in traffic demands.	Noted		
	The proponents should give consideration to the connection of Gould Street to Cosgrove Road, and/or, the existing internal road within the site, with the aim of providing an alternate egress / access arrangement thereby relieving some of the congestion at the intersection of Cosgrove Road and the Hume Highway	Linking Gould Street to Cosgrove Road has been considered subsequent to the submission of the EA. Analysis of alternative entry / exit points was also undertaken by SPC as part of the previous studies for Enfield. Intersection upgrade at Cosgrove Road / Hume Highway is still required in the future – even with Gould Street and Cosgrove Road being linked.		
	The traffic recommendations of the review in terms of the current proposal are summarised below: • the intersection of Roberts Road and Norfolk Road be completely reconfigured in order to adequately meet the needs of this proposal;	Norfolk Road/Wentworth Street is approved for use by 23m B-doubles. Swept path analyses were undertaken subsequent to the submission of the EA. In addition, Council and the RTA has previously (June 2005) undertaken tests with 25m B-doubles at Roberts Road / Norfolk Road. The testing indicated problems with the left turn into Norfolk Road. SPC expects this left turn will need to be re-configured. Council indicated no problems with other movements at this intersection.		
	• the traffic signal phasing of Roberts Road and Norfolk Road be altered to eliminate the current filter right turn movement from the eastern arm of Norfolk Road by providing a controlled right turn movement;	No upgrade is necessary to allow for adequate signal operation. However, as stated in Chapter 7 of the EA, this intersection will be enhanced to improve traffic flow ,in consultation with the RTA– see responses above.		
	• the intersection of Norfolk Road and Wentworth Street be surveyed and a Road Safety Audit conducted to ensure that long vehicles	Norfolk Road/Wentworth Street is approved for use by 23m B-doubles. Swept path analyses were undertaken subsequent to the submission of the		

	can safely negotiate the corner;	EA. In addition, Council and the RTA has previously (June 2005) undertaken tests with 25m B-doubles at Roberts Road / Norfolk Road. The testing indicated problems with the left turn into Norfolk Road. SPC expects this left turn will need to be re-configured. Council indicated no problems with other movements at this intersection.		
	• that Wentworth Street be reclassified as a State Road and become the responsibility of the Roads and Traffic Authority, NSW;	This is an issue between the RTA and Council.		
	• on-street parking on the southern side of the eastern arm of Norfolk Road be prohibited for a distance of 50 metres;	Banning parking for this length would improve intersection operation. Alternative parking arrangements could be incorporated into the detailed design for the intersection. This will be further discussed during detailed design of the intersection		
	• the suggestion that the RTA investigate options to improve the operation of Centenary Drive and Arthur Street be supported, as the performance of this intersection will deteriorate in line with growth in traffic demands;	Noted.		
	• Local area traffic management measures for Cosgrove Road and surrounding streets be further investigated to optimise the access / egress arrangements to the site;	Local area traffic management will be considered for Cosgrove Road to prevent vehicles travelling southbound from the site or entering the site from Cosgrove Road when travelling northbound. However, heavy vehicles currently use this road to access the industrial land uses along Cosgrove Road. Truck access to the residential area east of Cosgrove Road is limited by the chicane in Madeline Street and Blanche Street being one-way westbound.		
	• the proponents' recommendation for widening of the Hume Highway be supported.	Noted.		
Traffic	Council is supportive of denying heavy vehicle access from the southern end of Cosgrove Road (where it meets Punchbowl Road), as this should have the effect of limiting heavy vehicle movements through local streets in Canterbury City to reach the site. Council will however want to be satisfied that the configuration of the southern end of Cosgrove Road is satisfactory to limit heavy vehicle movements, as no details are provided in the	The residential area east of Cosgrove Road has a heavy vehicle limit in place. Cosgrove Road is currently used by some heavy vehicles accessing existing land uses adjacent to the ILC site. Sydney Ports will not be attempting to control movements unrelated to the ILC. Given the market area for the ILC, there should be no need for ILC trucks to use Cosgrove Road south of the site access point. Nevertheless, the movement of vehicles from the Cosgrove Road	816	Canterbury Counci) **DoP Submission Nos 157 & 162**

	Environmental Assessment. The intention to do these works should be enforced by a condition of consent if this proposal is approved.	entrance will be monitored and access/egress controls implemented of required.		
Traffic	• Traffic Impacts; Council has concerns about the proposed access to and from the facility, the assumptions behind some of the traffic modelling, the impact on some already under performing intersections, the impact on arterial road congestion and adjoining residential land uses, and the need for State government commitment to a wider strategy of arterial road upgrading works to support the proposal. • Traffic Impacts; Council has concerns about the proposed access locations to and from the facility, the assumptions behind some of the traffic modelling, the impact on some already under performing intersections, the impact on arterial road congestion and adjoining residential land uses, and the need for State government commitment to a wider strategy of arterial road upgrading works to support the proposal. Council is also concerned that the EAR has not seriously considered an alternative access route to and from the site (specifically a paired intersection involving Gould Street and Cosgrove Rd onto the Hume Highway) which we believe could accommodate all traffic entering and leaving the facility, and improve integration with the arterial road network and negate the need for access via Roberts Rd, and as a result would not generate undue traffic impacts to the residents of Greenacre. To support this option, our submission includes a report by an independent consulting firm (Parsons Brinckerhoff) that demonstrates that this access route is feasible, and would not significantly impact on the road network. The report (summarised in the body of our submission) also identifies other significant deficiencies in the EAR which further highlight our concerns about the traffic impacts. Only 2 access points are proposed into the site. These are via Cosgrove Rd, from which trucks will gain access to the Hume Highway and thence to Centenary Drive, and secondly, via a bridge to	Noted. These issues are addressed as part of specific comments below. Noted. These issues are addressed as part of specific comments below. SPC has considered alternative access points as part of the previous studies in 2001. A paired intersection has been considered subsequent to the submission of the EA. However, the intersection between Cosgrove Road and Hume Highway still requires upgrading in the future. The junction is unable to accommodate 100% of traffic from the site even with the upgrade in the future. Noted. The distribution in the model minimises the travel time for ILC vehicles. As the majority of destinations are west of Enfield, the Roberts Road access is more popular. The expected split	815	Bankstown City Council **DoP Submission Nos 164 & 328**

	Wentworth Street and thence onto Norfolk Rd and onto Roberts Rd. It should be noted that the traffic modelling shows that almost all the traffic will go in and out via this latter access way.	between Norfolk Road and Cosgrove Road is 75%/25%, due to the layout of the site and operations.		
	The impact of the additional traffic generated by the proposed terminal was assessed by a model (calibrated by local traffic surveys), which modelled natural traffic growth projections for the area and adding the traffic generated by this development proposal.	Enfield ILC contributes less than 1% of overall traffic and therefore the impact of Enfield on the local and regional road network is negligible.		
	This assessment was analysed both with and without the proposal going ahead, to compare the effect of background traffic growth with the impact of the development. This analysis indicated that for almost all roads where the traffic counts were made that for peak periods, in both the morning and afternoon, there would be an inappreciable impact on traffic volumes as a result of truck movements generated by this facility.			
	The following 2 examples are provided to demonstrate this:	No comment required		
	Boronia Road in the Morning Peak. Travelling west along Boronia road in the morning peak there are presently 400 vehicles, 30 of which are heavy vehicles. By 2016, based on natural traffic growth there will be 830 vehicles, 70 of which will be trucks. However only 3 of these will be as a result of the proposed Sydney Ports facility. This indicates that the additional trucks caused by the facility, when compared against the projected future growth, and even against the existing situation is not significant in terms of traffic volume.	Noted.		
	Roberts Road in the Afternoon Peak. Presently travelling north along Roberts Road in the afternoon peak hour are 2020 vehicles consisting of 260 heavy vehicles. By the year 2016 there will be 2410 vehicles making this same journey but the number of heavy vehicles has actually dropped to 190. (Sydney Ports was contacted to find out why the vehicle numbers had dropped but have not responded to my query) Of this, 8 are attributable to the proposed terminal. Again this volume is considered insignificant in comparison to the total number of trucks. Similar results were reported for other roads,	Noted. There will be some redistribution of traffic across the network, due to the way traffic is assigned in the network model, which is sensitive to changes in travel time.		

	and it was concluded that the truck volumes generated by the facility would not be sufficient to cause an impact on the road network in terms of additional traffic, having regard to existing and projected traffic volumes.			
	<u>Site Access arrangements, and associated impacts on the Local Road Network</u>. The traffic projections included in the EAR indicate that almost all traffic entering or leaving the site will do so via the access onto Roberts Rd. Trucks will turn either north or south along Roberts Rd depending upon their final destination. Only 1 or 2 trucks are shown entering or leaving the facility via the Cosgrove Rd access point and then turning onto the Hume Highway from where they either go east or west along the Hume Highway or north along Centenary Drive.	Noted.		
	Whilst we understand that this situation arises because of the Cosgrove Rd/ Hume Highway intersection being at full capacity, we nevertheless believe this to be an inequitable way of distributing the traffic entering and leaving the site, since there will be greater impact on roads that pass through a residential area within the Bankstown LGA, rather than integrating directly with the Hume Highway corridor.	The distribution in the model minimises the travel time for ILC vehicles. As the majority of destinations are west of Enfield, the Roberts Road access is more popular. The expected split between Norfolk Road and Cosgrove Road is 75%/25%, due to the layout of the site and operations.		
	Whilst the assessment has shown that the traffic impacts are minimal in terms of traffic volumes and impacts on intersection capacity, it will remain the case that some 1160 trucks per day will be entering or leaving the site on the roads through Bankstown as a result of the proposed development.	Enfield ILC contributes to less than 1% of overall traffic and therefore the impact of Enfield on the local and regional road network is negligible.		
	This is a significant increase, and is likely to be associated with other environmental impacts, including traffic noise and congestion, air pollution, potential disruption to existing land uses, disruption to existing residential character of existing roads in Greenacre.	See response above, In addition, it should be noted that there are some 7000 heavy vehicles (11% of total) currently using Roberts Road each weekday, and about 4600 heavy vehicles (9%) using the Hume Highway. The ILC vehicles will not be concentrated on a single road, allowing any impact to be more easily absorbed. The other environmental impacts have been considered and presented in the appropriate sections of the EA.		
	<u>Impact on Boronia Rd/Juno Pde</u>			

	One of Bankstown Council's main concerns about traffic impacts is the potential for impact on the roads in Bankstown caused by the use of roads passing through residential areas. We note that Roberts Rd and Boronia Road have both been identified as suitable for use by trucks entering and leaving the facility. Whilst the EAR shows that projected truck volumes for Boronia Street will be low, we object strongly to the use of Boronia Rd/Juno Pde as a route for trucks associated with this facility. The justification for trucks using Boronia Rd/Juno Pde is that it is classified as a State Road.	Boronia Road / Juno Parade are State Roads and also permitted routes for B-Doubles. They have not been nominated for use by ILC vehicles, but identified as potential routes that could be used by vehicles accessing the ILC facility. Our modelling indicates that the volume of ILC traffic that would use these roads is low. The ILC traffic using Boronia Road accounts for less than 1% of future traffic (6 vehicles per hour in AM and PM peak). It is not considered that the ILC traffic will adversely impact on Boronia Road.		
	However, it is also true that Boronia Rd/Juno Pde is totally different in character to the other State roads (such as the Hume Highway, M5 Motorway, Centenary Road) that have been nominated as the main access routes for trucks moving to and from this facility.	The difference in character is noted.		
	It is clear from a site inspection of Boronia Rd that in spite of its classification, it is a residential road in its character, being lined by residential dwellings, and furthermore, it has not been constructed to the same standard as the other State roads that have been nominated.	Noted. This is an issue between Council and the RTA.		
	We object to Boronia Rd being identified as a route that is able to be used by trucks and from this facility as we believe that this will cause a diminution of the residential character of this road, and more importantly will result in unacceptable traffic, noise and potential road safety impacts to the residents of this road, as well as similar impacts at the Greenacre town centre.	There was no evidence presented to support this comment. The ILC traffic using Boronia Road accounts for less than 1% of future traffic (6 vehicles per hour in AM and PM peak). It is not considered that this will adversely impact Boronia Road.		
	Furthermore, the identification of Boronia Rd and Roberts Rd as State Roads has already lead to them being used in a way that has resulted in significant cumulative impacts and loss of amenity to the people that live along these roads. Complaints from residents about this matter were received by Council officers during the submission period for this proposal.	This is an issue between Council and the RTA.		
	As noted in the EAR traffic volumes are forecast to grow significantly along these roads and this will only	This is an issue between Council and the RTA.		

	result in further loss of environmental quality. Council considers that the RTA should fund works to help redress the impacts of this including noise barriers and a more noise absorptive surface to ensure that such loss of amenity is minimised. <u>Other Impacts on Local Roads.</u> Bankstown Council is also concerned about the possibility of truck movements along other roads with a residential character. Again this may arise from trucks leaving the facility and travelling along Roberts Rd from where they could easily attempt to access the Hume highway by using non - State roads such as Rawson Rd, Norfolk Rd (and other like roads).	The Movement of trucks through the residential area will be restricted, and managed through LATM measures to be undertaken with the RTA and Councils.		
	These roads (like Boronia Rd) are also residential in character but are not classified as a state roads, and so legally should not be used by large trucks, and we certainly object to any use of these roads by trucks from the facility.	Noted. The majority of streets in the residential area of Greenacre are load limited roads and therefore large vehicles are unable to use these roads. See response above.		
	Whilst the EAR acknowledges that this should not occur and points to Local Area Traffic Measures as a means of preventing this from occurring, this is made as a general recommendation, with no specific measures being proposed, and Council has no confidence at this stage that the LATMs will work, particularly outside peak times.	Noted. See response above.		
	Another source of impact on the local roads which has not been assessed in the EAR is the likely increase in the use of residential roads in the area by cars that are taking detours to avoid the state roads that will become busier as a result of the additional trucks using them. This matter has not been addressed in the EAR, nor have any mitigation measures proposed. It could however be reduced if the issue of access to and from the site was reviewed such that essentially all of the access was not provided via Roberts Rd, and better levels of access were provided to Cosgrove Rd and the Hume Highway.	The ILC would not significantly impact on delays at intersections in the area. The potential for rat-running for large vehicles will be addressed through the LATM measures that SPC would develop in consultation with Council and the RTA. Rat-running by private vehicles is more difficult to manage without detrimentally impacting on the route choice of residents and local public transport vehicles. The ILC contributes less than 1% of the traffic on the road network. Background traffic growth is the contributor to diminished future road and intersection performance.		
	<u>ii) Concerns about the Modelling Included in the EAR.</u> The underlying assumption is for container activity of	The ILC is designed to handle up to 300,000		

	300,000 TEUs to generate traffic from the proposed development. However the EAR did not assess the traffic impact as a direct result of the change in this assume throughput, that could eventuate if some of the other proposed intermodal terminals do not proceed, or if there is a variation in rail throughput;	TEU .		
	• The EAR traffic models for the morning peak periods cover the one-hour time period within each of these peak periods. However the Sydney commuter road network has longer commuter peak periods.	The models used in the EA assess the peak one-hour period in the morning and afternoon. These are the periods of maximum impact. Assessment of one-hour peak periods is standard industry practice.		
	Ideally the morning model included in the EAR should have had a 2 hour peak period from 7.00am - 9.00 am while the evening peak periods should have had a three hour period from 3.00pm - 6.00pm;	See previous response.		
	• The EAR traffic model was not benchmarked against the Transport and Population Data Centre's Metropolitan Strategic Travel model;	The 2005 base trip table has been calibrated for observed volumes at some 15 key locations in the Enfield area, identified in the EA.		
	• It is unknown how the existing base year trip matrix was derived. This could lead to considerable variations in the traffic impacts from the facility;	The trip table from which the base table was calibrated has evolved from previous projects, where calibration has also been undertaken.		
	• The traffic model included in the EAR does not appear to have captured the effects of regional traffic surrounding the proposed facility, as the models were calibrated using counts undertaken within the immediate vicinity of the site. The use of RTA screenlines would have helped in this regard;	The counts collected for this project do include regional (as well as local) traffic that use the road network in the vicinity of the ILC. In the context of the study, the model is not being used to forecast traffic diversion due to a new link or other network issue. The impact of the ILC is confined to a relatively small area (see Figure 2.2 of the EA Appendix B, which was discussed with the RTA at the commencement of the study). It is appropriate to concentrate on the sub-regional level rather than the wider network.		
	• The EAR traffic model has not met major screenline calibration standards thereby resulting in less robust modelling results;	The cited additional calibration measures are only relevant to a regional model assessing wider implications of network change (eg a new link or road closure). The impact of the ILC is limited to the sub-regional level, and the adopted calibration process is appropriate.		
	• The EAR indicated that the 2016 base trip matrix	SKM used trips matrices for future trips relevant to		

	was developed using population and employment forecasts provided by DIPNR, but has not shown the changes between 2005 and 2016;	2016. The 2016 matrices have been used reliably by SKM for several years to forecast future traffic growth. Specific and significant changes were added to the matrices to reflect Port Botany expansion and Sydney Airport future growth (as documented).		
	• The EAR did not indicate which vehicle categories were included in the traffic model's commercial trip table nor did it explain the process applied for developing the future commercial trip table;	The commercial vehicle trip table includes an estimation of heavy vehicle activity, and was calibrated in the local area for 2005 counts. The future commercial vehicle matrix takes into account growth in industrial activity across Sydney.		
	• The traffic assignment technique used is also unclear and how commercial vehicles were converted into equivalent passenger car units;	The truck matrix in NETANAL is used to estimate the effect of heavy vehicles on link and intersection capacity. It is not used on a stand-alone basis. The proportion of heavy vehicles in the traffic stream is one of the inputs to the INTANAL intersection models. The PCU factors are documented in the working paper. The INTANAL default pcu factor of 2 for heavy vehicles was not modified for this project.		
	In Summary some of these deficiencies may on their own be of minor significance. However, when considered cumulatively they indicate that it is simply not possible to have confidence about the findings of the traffic analysis. Given the significance of traffic impact to this proposal, this is a matter of great concern.	The modelling approach used for the EA is appropriate for the assessment of the impact of the ILC. The findings of the traffic study are supported by an analysis of existing conditions, which reveal that many intersections around the ILC are already approaching capacity. Future background growth in traffic volumes, independent of the ILC, are likely to result in conditions as outlined in the traffic study.		
	<u>Concerns About Intersection Performance.</u> In reviewing the EAR, Council considered that it seemed to have glossed over the issue of intersection performance, and the adequacy of existing intersections.	The key intersections surrounding the ILC were analysed. The intersection analysis and reporting undertaken is appropriate for the assessment of the impact of the ILC		
	One reason that we considered this to be the case was because of Councils knowledge of the road network in Bankstown. In particular, we know that the that the Roberts Rd/Norfolk Rd intersection is already performing very poorly, as there are often pronounced northbound delays along Roberts Rd in the AM peak. However, this did not seem to be suitablyacknowledged in the EAR.	The analysis undertaken was based on data collected by an independent traffic counting company, specifically for this project. While there may be congestion experienced at times conditions are such that satisfactory Levels of Service are achieved across the space of an hour. The analysis undertaken as part of the EA in industry standard practice.		

	To further consider the issue of intersection performance, PB were asked to address this matter by the "swept path" technique. This technique looks at the actual physical space occupied by large vehicles as they turn through intersections, and provides a more thorough and reliable way of assessing intersection performance. The EAR did not include a swept path analysis of large vehicle movements at critical intersections, and Council (and PB) considered this to be a major deficiency in the traffic assessment.	Noted. Swept path analyses were undertaken subsequent to the submission of the EA, to determine possible traffic management measures for the Roberts Road / Norfolk Road intersection. Subsequently, swept path analysis has been undertaken on Hume Highway / Cosgrove Road and Boronia Road / Roberts Road intersections. Strathfield Councill and the RTA have previously, (June 2005) undertaken tests with 25m B-doubles at Roberts Road / Norfolk Road. The testing indicated a problem with the left turn into Norfolk Road. This turn would be possible with intersection improvements (i.e. a splayed intersection approach – left turn in form Roberts Road). Council indicated no problems for other movements at the intersection with a 25m B-double.		
	A complete account of the "swept path" analysis is included in PB's report that is attached to this submission. In summary this analysis was undertaken for 3 intersections where future freight traffic was of concern due to the existing configuration and their ability to handle and increase in the number of large vehicle movements. The intersections selected for a swept path analysis were: • Roberts Rd and Norfolk Rd • Roberts Rd and Juno Pde; and • Liverpool rd and Cosgrove Rd.	These intersections currently handle large vehicles and Norfolk Road, Juno Parade and Cosgrove Road are all permitted for use by B-doubles. As such the use of these roads by the ILC should not be a concern.		
	In summary, PB found critical shortcomings in the ability of all 3 intersections to accommodate heavy vehicles, and suggested that they would all need to be upgraded.			
	Whilst some of the turning movements were found to be physically possible, it may have meant for example making a left hand turn from a through lane. This was found to be undesirable since it could increase the risk of collisions and put vulnerable road users at risk, as well as delaying through traffic. Similarly, a right turn should not have to be made from through lanes, particularly when heavy vehicle movements of some 1200 movements per day are expected.	It is noted that these vehicles may not be able to make certain manoeuvres from their designated lanes, but this is consistent with swept paths of trucks and some public transport vehicles across Sydney. The right turn from Roberts Road into Norfolk Road has a designated right-turn bay.		

	As noted, the EAR did not consider "swept path" when assessing intersection capacity, and this is considered to be a major deficiency in the assessment. In particular, when the Roberts Rd/Norfolk Rd and Liverpool Rd/Cosgrove Rd intersections are being prosed as access points to the site. At these two intersections, some semi-trailer and B-Double turning movements are not physically possible due to inadequate geometric clearance.	See response above.		
	The PB assessment found that the Roberts /Rd Norfolk Rd intersection was more critical due to its smaller turning radii, and it suggested that Roberts Rd should not be used as access to the site, unless the intersection with Norfolk Rd was upgraded to accommodate the turning requirements of large trucks.	Noted. See response above. The re-design of the left turn in to Norfolk Road from Roberts Road will allow this.		
	The PB report also provides other information concerning the review of intersection performance included in the EAR. It notes that the EAR only assessed intersection capacity by considering level of service and delays, and that it did not show the extent of queuing or the degree of saturation. Normally an analysis of intersection performance would, besides considering level of service and delay would also include a review of the degree of saturation of the intersection and queuing, as this provides a more comprehensive understanding about how the intersection is performing.	According to the RTA's Guide to Traffic Generating Developments, "the best indicator of the level of service at an intersection is the average delay experienced by vehicles at that intersection." The criteria for Level of Service outlined in Table 4.2 of the Guide relate to average delays only.		
	The failure in the EAR to consider these aspects of intersection performance is an oversight and means it is not possible to have the necessary level of confidence in the findings of the EAR regarding intersection performance	Given the growth in background traffic, the ILC contributes to less than 1% of overall traffic. As such the statement is considered unfounded.		
	Other Council Concerns about Traffic Conclusions Regarding Traffic Impacts:			
	Regarding traffic volumes, the EAR finds that these are acceptable because they will be just a small component of the projected traffic growth in the area, and that any impacts that will occur on the road network or intersection capacity will be due to the natural increase in traffic, and that the RTA will then need to fix the resulting problems to the arterial road	The ILC will contribute less than 1% of traffic and its contribution to any network deficiencies will be very minor.		

	network. This is a rather disingenuous response to the issue and ignores the fact that the Sydney Ports proposal is responsible for a large volume of the traffic that will cause considerable problems, and that the performance of the proposed facility will be impacted by congestion at key surrounding intersections.			
	Internal Traffic Management. This matter has not been properly addressed. In particular, there is not enough detail on how truck movements and employee generated movements will impact, especially at time of shift change over. There are many industrial sites in Bankstown where shift changes generate serious traffic problems as employees try to access State roads. In this case the problem would be exacerbated with trucks also attempting to leave the site at what will be close to the peak projected time for truck movements to and from the facility. This issue needs further consideration, and again could be ameliorated to some degree if more heavy vehicle access could be provided via Cosgrove Rd.	The impact of shift changeovers would be mitigated by the diverse range of origins and destinations of staff, and the site layout. There would be greater use of Cosgrove Road by staff than there might be by trucks. Furthermore, many of the staff employed at the ILC may move from other jobs and may well be travelling at that time regardless.		
	Bankstown Councils Recommendations Regarding Traffic Impact. In conclusion, Council is concerned that essentially all the traffic impacts will be unnecessarily directed to the residents of Bankstown, although direct access to the Hume Highway is feasible and in our view desirable. Council considers that options for spreading the traffic more equitably should be considered more comprehensively in the EAR. In order to address our concerns we ask that consideration be given to the following issues:	Providing access to the Hume Highway would not change the origin and destinations of freight, which necessitates travel through the Bankstown LGA. However, ILC truck traffic would be directed to use designated arterial road routes.		
	A Preferred Alternative Access Arrangement. Most importantly, Bankstown Council wishes to suggest an alternative access arrangement to and from the site, which is to provide primary access via Gould Street and Cosgrove Rd. Under this scenario, Cosgrove Rd and Gould St would operate as a one-way link pair, with the traffic along Gould St flowing north (away from the site) and traffic along Cosgrove Rd flowing south – into the site. Both intersections with Liverpool Rd would operate under paired and co-ordinated signal control. An emergency second access point would also be provided to the facility under this option, at the	SPC previously considered numerous alternative access points for the site. The conclusion was that Norfolk Road / Roberts Road and Cosgrove Road / Hume Highway were the preferred access points. Access to the site via Punchbowl Road is not permitted. An analysis was undertaken subsequent to the EA of the one-way pair option. This indicated that while satisfactory operation of the 2 linked intersections (Gould Street and Cosgrove Road) would be achieved in the short term, with background growth, the 2-lane eastbound constraint on the Hume Highway		

	southern section of Cosgrove Rd, where it intersects with Punchbowl Rd. Council had previously requested that this access arrangement be comprehensively considered and addressed in the EAR. A copy of a letter issued by Council to Sydney Ports that includes this request is attached. However, in spite of our request, Sydney Ports has not seriously considered this alternative access arrangement involving the Gould St. and Cosgrove Rd intersections with Liverpool Rd operating as a paired intersection. To remedy this deficiency in the EAR, Council requested PB to undertake a detailed review of this option for Council. The complete review by PB is included in their report, which is included as an attachment to this submission. In summary however, PB found that this access arrangement is technically feasible both for existing and future traffic projections included in the EAR, and would still provide for all relevant intersections (including the Centenary Drivel/Liverpool Rd intersection to operate with satisfactory conditions and spare capacity. It was not found necessary- to make any changes to this intersection (such as a lengthening of the right turn lane). Council considers that this alternative access arrangement would provide several benefits over the access arrangement suggested in the EAR. These benefits include: • It would direct all access to and from the site onto the state Road network. By doing this it would mean that there would not be the desire lines created for large trucks through residential areas such as Norfolk Rd, and Boronia Rd. This would mean that residents from these residential areas would not be exposed to some 1200 additional truck movements per day, and the associated impacts due traffic, noise, and air quality impacts; • It would obviate the need for a costly overbridge to provide access onto Roberts Rd. This would be a significant cost saving to Sydney Ports. • It would mean that improvements to a number of intersections associated with the Roberts Rd access would not need to be undertaken.	would result in unsatisfactory performance in the future without the ILC. Even with 3-lanes provided eastbound, the Cosgrove Road intersection would be at LoS E with 100% of ILC traffic using it. This is the same result as documented in the EA for 100% of ILC traffic using the Cosgrove Road intersection. Therefore it is not feasible to channel all ILC vehicles through this intersection. Furthermore, it would add further pressure to the Hume Highway / Centenary Drive intersection, as a large proportion of ILC trucks would use Centenary Drive. Only allowing access via Cosgrove Road would take traffic off the Centenary Drive / Roberts Road overpass and direct it through the at-grade intersection instead. See response above. The current proposed access arrangements also direct all ILC traffic onto the State Road Network. However, providing access to the Hume Highway would not change the origin and destinations of freight, which necessitates travel through the Bankstown LGA. However, ILC traffic would be directed to use only designated arterial roads. Due to the diverse range of origins and destinations, no single road would be exposed to all 1160 ILC heavy vehicles per day. The western access and the bridge is required for operational efficiency and OHS requirements. No specifics were given as to which intersections PB were referring to along Roberts Road. The EA		

		does not identify any improvements to Roberts Road intersections that would be required as a result of the ILC.		
	In particular, The current intersection at Roberts Rd and Norfolk Rd does not permit a B-Double to make a left hand turn, and even a semi-trailer cannot make a left hand turn without occupying the adjacent lane. Upgrading would certainly be required at this intersection, yet it appears that there is limited scope to widen this intersection.	Norfolk Road/Wentworth Street is approved for use by 23m B-doubles. Swept path analyses were undertaken subsequent to the submission of the EA. In addition, Council and the RTA has previously (June 2005) undertaken tests with 25m B-doubles at Roberts Road / Norfolk Road. The testing indicated problems with the left turn into Norfolk Road. SPC expects this left turn will need to be re-configured. Council indicated no problems with other movements at this intersection.		
	Similarly, other intersections along Roberts Rd would not need to be widened or upgraded, thereby involving cost savings to the RTA.	No specifics were given as to which intersections PB were referring to along Roberts Road. The EA does not identify any improvements to Roberts road intersections that would be required as a result of the ILC		
	For these reasons, it is proposed by Council that this means of accessing the site is preferable to the access arrangement via Roberts Rd that is included in the EAR.	Noted.		
	Other Recommendations. Other council recommendations regarding traffic are:			
	Identification of Designated routes for trucks and the monitoring and enforcement of these routes. It will be necessary to agree on designated routes for traffic movements and to confine all truck movement to these routes. The identified routes should be specified clearly in any approval for the project given by the Minister for Planning.	The trucks from the ILC will be directed onto the surrounding arterial road network.		
	Boronia Road/Juno Pde should not be identified as suitable for truck movements for reasons explained above, and of course the other residential road in Greenacre (including Rawson Rd. and Norfolk Rd should definitely be made totally off limits to trucks. There should be provision for on going compliance monitoring of the use of these routes by Sydney Ports, using measures such as driver induction programs, cameras and traffic management	Boronia Road / Juno Parade is a designated State Road and Heavy Vehicle Route. Rawson Road and Norfolk Road have a 3-tonne limit in place. Traffic management measures at Roberts Road / Norfolk Road have been discussed with the RTA and will be further explored with the Traffic Working Group.		

	measures to prevent trucks using non specified routes, and provision for very heavy penalties (fines payable to Bankstown Council) if they do. These measures should be developed at no cost to Council but should be developed in consultation with Council.	Traffic management measures at Roberts Road / Norfolk Road will be developed in consultation with the RTA and Council.		
	<u>Upgrading by the RTA of Roads, intersections etc.</u> The RTA needs to commence an upgrading and ameliorative program for roads that are already suffering from cumulative impacts because of heavy traffic use. Roads requiring works are: • Norfolk Rd/Roberts Rd Intersection; • Boronia Rd/Juno Pde • Roberts Rd; • Hume Highway/Cosgrove Rd; • Hume Highway Centenary Drive. Upgrading of all these roads and intersections should be included as conditions of consent. No approval should be given to the facility without a staged program for upgrading these intersections that precedes the completion of this facility.	This is an issue between RTA and Council. It is not considered appropriate that the upgrading of roads and intersections be included as a condition of consent as the ILC contributes to less than 1% of the overall traffic on the network.		
	<u>Ongoing Monitoring of Traffic Impacts.</u> In view of the ongoing potential for traffic impacts Council considers that there should be ongoing monitoring of the facility and the traffic impacts. A task force should be established to monitor traffic impacts, both in the short term, and as the terminal expands to full capacity. Should the impacts be found to be worse than indicated then there should be a means of redressing them at no cost to Council. Bankstown Council, Strathfield Council, the RTA, the Dept of Planning and Sydney Ports should be represented on the Committee This should be provided for in any conditions of approval attached to the proposal	SPC will maintain contact and consultation with the Councils and RTA through the Traffic Working Group, already established.		
	<u>Review of Modelling of Traffic Impact and Intersection Performance</u>. The matters raised in this submission concerning likely deficiencies in the traffic assessment in the EAR and the concerns about intersection performance due to its failure to consider "swept path" should be redressed and the	Noted.		

	conclusions re-evaluated based on this review. SUMMARY and CONCLUSION in the EAR which further highlight our concerns about the traffic impacts. Traffic Impacts; Council has concerns about the proposed access locations to and from the facility, the assumptions behind some of the traffic modelling, the impact on some already under performing intersections, the impact on arterial road congestion and adjoining residential land uses, and the need for State government commitment to a wider strategy of arterial road upgrading works to support the proposal. Council is also concerned that the EAR has not seriously considered an alternative access route to and from the site (specifically a paired intersection involving Gould Street and Cosgrove Rd onto the Hume Highway) which we believe could accommodate all traffic entering and leaving the facility, and improve integration with the arterial road network and negate the need for access via Roberts Rd, and as a result would not generate undue traffic impacts to the residents of Greenacre. To support this option, our submission includes a report by an independent consulting firm (Parsons Brinckerhoff) that demonstrates that this access route is feasible, and would not significantly impact on the road network. The report (summarised in the body of our submission) also identifies other significant deficiencies **COMMENTS FROM LETTERS IN 2005** I would like to re-iterate our concerns about traffic impacts that were raised at this meeting by Bankstown Council's representative (Martin Beveridge). In particular, Council is concerned that if there is any	Noted. These issues have been addressed as specific comments / responses in this document. SPC previously considered numerous alternative access points for the site. The conclusion was that Norfolk Road / Roberts Road and Cosgrove Road / Hume Highway were the preferred access points. Access to the site via Punchbowl Road is not permitted. An analysis was undertaken subsequent to the EA of the one-way pair option. This indicated that while satisfactory operation of the 2 linked intersections (Gould Street and Cosgrove Road) would be achieved in the short term, with background growth the 2-lane eastbound constraint on the Hume Highway would result in unsatisfactory performance in the future without the ILC. Even with 3-lanes provided eastbound, the Cosgrove Road intersection would be at LoS E with 100% of ILC traffic using it. This is the same result as documented in the EA for 100% of ILC traffic using the Cosgrove Road intersection. Therefore it is not feasible to channel all ILC vehicles through this intersection. The traffic impact assessment relating to Enfield ILC is not deficient. The reasons are as described in responses above. Noted. Traffic management measures have been		

	access from the facility onto Roberts Road, then this will certainly result in large numbers of trucks attempting to access the Hume Highway via local roads in the Greenacre area, such as Juno/Boronia Roads, Norfolk Road, Rawson Road and possibly other roads as well.	considered in consultation with the RTA regarding prevention of access by B-Doubles into the residential area. Juno Parade / Boronia Road is a State Road and a designated B-double route. However, its use by ILC trucks would be minimal. Regardless of the ILC, this route would still be used by trucks.		
	In view of the large numbers of trucks that are associated with the proposal, we believe that the movement of trucks along these roads would result in unacceptable impacts in a residential area. Whilst it is true that Boronia Road has been designated as a State Road, it is essentially a local residential road in its character and we believe that it does not have the capacity of other State Roads (such as the Hume Highway for example) to cope with the expected volume of trucks generated by this facility.	Heavy vehicles currently make up 13% of AM peak period traffic and 8% of PM peak period traffic on Boronia Road. The ILC would add only 6 vehicles per hour to this route. The difference in character of Boronia Road is noted.		
	Boronia Road also passes through the Greenacre town centre, in which Council is presently undertaking some major improvements. The value of these improvements would be seriously undermined by trucks passing along Boronia Road through the Greenacre town centre.	There are presently heavy vehicles using this route. The ILC would have a very minor marginal impact.		
	Of the other roads mentioned above (Norfolk and Rawson) it is true that these are local roads and as such semi trailers are not permitted to use them.	Traffic management measures have been considered in consultation with the RTA regarding prohibiting trucks in the residential area. These will be further discussed with the Traffic Working Group. These roads already have 3-tonne limits in place.		
	Nevertheless we believe that given the large numbers of trucks involved that it is inevitable that many trucks will use these roads, and that they will cause unacceptable impacts to the residents of these streets.	Heavy vehicles from the ILC will not be permitted to use local streets.		
	It was for these reasons that Council expressed its opposition to any access to or from the facility onto Roberts Road at the meeting held on 31 May.	The access point onto Roberts Road is the key access point to the facility. This access point will enable direct access onto the arterial road network for ILC vehicles.		
	As an alternative, Council requests that a comprehensive evaluation be provided during the EIS process of providing all access to and from the site from its northern areas at Gould Street and Cosgrove Road. This would ensure that the trucks	See previous responses regarding one-way pair at Cosgrove Road / Gould Street In addition, two access points are required into the site as a safety and operational issue.		

	would have direct access from the facility onto the Hume Highway, from where they could access other State roads travelling northwards or southwards, or else remain on the Hume Highway. This option would avoid any of the impacts on the local roads in Greenacre that would be impacted on by the Roberts Road option.	Directing all ILC traffic via Cosgrove Road would add pressure to the Hume Highway / Centenary Drive intersection, rather than allowing ILC trucks to bypass traffic signals on the overpass.		
	For these reasons, I confirm that Council does not support the proposal in its present form, and will remain opposed to it until the feasibility of the Gould Street/Cosgrove Road option has been fully assessed.	Noted.		
	COMMENTS FROM PARSONS B REPORT The traffic assessment in the EA appears deficient in a number of areas:			
	• There is no overall Freight Strategy within which to measure the contribution of this project.	The FIAB report prepared as part of the Government's Metropolitan Intermodal Freight Strategy for Import and Export Containers (refer Metropolitan Strategy – Transport Strategy for Sydney) supports the need for the Enfield ILC as part of a number of intermodal terminals required to serve the Sydney Basin and to achieve the Government's rail mode share target.		
	• While the project is justified on the basis of increasing mode share of freight logistics to rail, there is no commitment to the rail upgrades necessary to make intermodal transfer attractive, which may result in poor forecasts of truck traffic.	The rail line is already operational and capable of handling predicted trains to/from Enfield. The Metropolitan Intermodal Freight Strategy identifies the need for upgrade works in the longer term to accommodate the overall development of the intermodal freight strategy.		
	• Much of the local impacts are to be mitigated by a heavy vehicle management plan and a local area traffic management plan but these are not provided in the document and there is only general discussion of what they might contain.	A heavy vehicle management plan is not required at this stage but will be developed in consultation with the RTA prior to ILC operations commencing. Traffic management measures have been considered in consultation with the RTA and a LATM plan will be prepared.		
	• While a list of intersections requiring upgrade is provided, no preliminary designs or costs are provided, so the overall burden of state and local road authorities is not yet measurable. The timetable of the upgrades to match development of the ILC is not provided.	Not required at this stage. The works proposed for the Roberts rd/ Norfolk Rd intersection will be developed during concept / detailed design in consultation, with the RTA as required.		

	• There is no sensitivity testing of the truck generation rate and the forecast TED movements. The traffic volumes are given as absolutes, so risks and ranges are not assessable. • The NETANAL model used in the EA is suspect in that:	Sensitivity testing was undertaken and is discussed in Appendix B of the EA.		
	> source and method of base 2005 trip table development done separately for cars and trucks	The 2005 base trip table has been calibrated for observed volumes at some 15 key locations in the Enfield area, identified in the report, but not cited by PB. The trip table from which the base table was calibrated has evolved from previous projects, where calibration has also been undertaken.		
	> NETANAL 2005 demand should be verified by interpolating demand between 2001 Census and 2006 forecast. Census Journey to work data (JTW) in conjunction to TPDC trip table should provide a reasonable basis for estimating 2005 base year demand.	The base matrix (2005) has been calibrated for observed volumes in the Enfield area. Previous to use on this project, the matrix had been calibrated for various projects around the Sydney metropolitan area. The degree of matching between observed and modelled flows is shown in Appendix A of the Traffic Report (Appendix B of the EA).		
	> traffic count data did not capture regional travel demand which is a critical issue for the ILC. RTA has defined 16 screenlines across the overall Sydney network. Part of RTA screenlines 1, 5 and 11 would intercept ILC traffic on the wider area network (see Figure 2.1).	The counts collected for this project do include regional (as well as local) traffic that use the road network in the vicinity of the ILC. In the context of the study, the model is not being used to forecast traffic diversion due to a new link or other network issue. The impact of the ILC is confined to a relatively small area (see Figure 2.2 of the EA Appendix B, which was discussed with the RTA at the commencement of the study). It is appropriate to concentrate on the sub-regional level rather than the wider network,		
	> Table 2.1 identified criteria where NETANAL model requires additional calibration.	The cited additional calibration measures are only relevant to a regional model assessing wider implications of network change (eg a new link or road closure). The impact of the ILC is limited to the sub-regional level, and the adopted calibration process is appropriate.		
	> documentation of the population and employment growth between 2005 and 2016 for inner and middle western catchments, predominantly the LGAs of Auburn, Bankstown, Parramatta, Fairfield, Holroyd, Blacktown, Liverpool, Ryde, Concord and	SKM used trips matrices for future trips relevant to 2016. The 2016 matrices have been used reliably by SKM for several years to forecast future traffic growth. Specific and significant changes were added to the matrices to reflect Port Botany		

	Strathfield, is missing.	expansion and Sydney Airport forecast growth (as documented).		
	> source and method of estimating future 2016 car and truck trip tables used to estimate background traffic growth has not been documented.	Car and truck estimates for 2016 were derived from the base 2016 trip matrices, adjusted by the calibration factors derived in the model validation.		
	> lack of documentation on traffic assignment technique and conversion PCU (passenger car unit) factors for various truck categories.	The truck matrix in NETANAL is used to estimate the effect of heavy vehicles on link and intersection capacity. It is not used on a stand-alone basis. The proportion of heavy vehicles in the traffic stream is one of the inputs to the INTANAL intersection models. The PCU factors are documented in the working paper. The INTANAL default pcu factor of 2 for heavy vehicles was not modified for this project. Subsequent analysis indicated that based on peak hour and daily traffic forecasts, the PCU factor of 2 is correct for this assessment.		
	The EA did not present turning paths at affected intersections, and severe potential problems are shown in Section 3 which raise questions about road safety and future road efficiency.	Swept path analyses were undertaken subsequent to the submission of the EA. In addition, Council and the RTA has previously (June 2005) undertaken tests with 25m B-doubles at Roberts Road / Norfolk Road. The testing indicated problems with the left turn into Norfolk Road. SPC expects this left turn will need to be re-configured. Council indicated no problems with other movements at this intersection.		
	Perhaps most significantly, the EA dismissed without sufficient investigation an access scenario where all ILC traffic would travel to and from the site by Liverpool Rd via Cosgrove Road, operating Cosgrove Road and Gould Street intersections with Liverpool Road as paired intersections.	Alternative access points have been previously considered by SPC. This analysis indicated that the Roberts Road / Norfolk Road and Cosgrove Road / Hume Highway intersection are the preferred access options. See previous responses above.		
	The above scheme would have limited impact on the operation of other nearby Liverpool Road intersections including Centenary Drive/Roberts Road intersection with Liverpool Road, based on PB's independent simulation modelling using future volumes documented in the EA. The above scheme would eliminate the need for an additional access to/from Roberts Road.	Channelling 100% of traffic through Cosgrove Road intersection would add further pressure to the Hume Highway / Centenary Drive intersection, as a large proportion of ILC trucks would use Centenary Drive. Only allowing access via Cosgrove Road would take traffic off the Centenary Drive / Roberts Road overpass and direct it through the at-grade intersection instead.		
	This would encourage ILC traffic to remain on the	Heavy vehicles will still use Roberts Road /		

	arterial road system when accessing the site, resulting in less intrusion of ILC traffic into established residential areas.	Norfolk Road. Traffic management measures have been considered in consultation with the RTA to stop traffic accessing local roads along Roberts Road (at Norfolk Road). These will be further discussed with the Traffic Working Group.		
	The above scheme would eliminate the need to upgrade the Roberts Road intersections (required to accommodate future anticipated ILC traffic)	The PB report is not specific about which intersections it is referring to along Roberts Road. The EA does not identify any improvements to Roberts Road intersections that would be required as a result of the ILC.		
	Not providing a Roberts Road intersection would also eliminate the need for the wasteful construction of the bridge necessary to access the Roberts Road.	The western access and the bridge are required for operational efficiency and OHS requirements.		
	The EA has rejected with insufficient grounds, the Cosgrove Road and Gould Street paired intersection with Liverpool Road scheme which could serve as access to the ILC site. This option not only has less impact on the operation of nearby Liverpool Road intersections, it would also save unnecessary construction of a bridge and access to Roberts Road.	See responses to specific comments above.		
	From a traffic perspective, this option is feasible under the future base case (without ILC) and future development case (with ILC) traffic forecasts.	SKM's analysis of the one-way pair option indicates that while satisfactory operation of the 2 linked intersections (Gould Street and Cosgrove Road) would be achieved in the short term, with background growth the 2-lane eastbound constraint on the Hume Highway would result in unsatisfactory performance in the future without the ILC. Even with 3-lanes provided eastbound, the Cosgrove Road intersection would be at LoS E with 100% of ILC traffic using it. This is the same result as documented in the EA for 100% of ILC traffic using the Cosgrove Road intersection. Therefore it is not feasible to channel all ILC vehicles through this intersection. Furthermore, it would add further pressure to the Hume Highway / Centenary Drive intersection, as a large proportion of ILC trucks would use Centenary Drive. Only allowing access via Cosgrove Road would take traffic off the Centenary Drive / Roberts Road overpass and direct it through the at-grade intersection instead.		
	From an economic perspective, it should cost less while preserving the performance of other key	There was no economic evidence presented to back up this statement. Directing all ILC vehicles		

	freights routes, and from an environmental perspective, it would reduce potential exposure of some residents in Bankstown to the noise, air quality, safety and vibration impacts of increased heavy vehicle movements next to homes.	via Cosgrove Road would increase the distance travelled by many trucks.		
	The EA has not demonstrated that it has effectively sought "to minimise the impact of the ILC on the surrounding environment and community" as it was charged to do in its own objectives. Much of the report is dependent on projects, such as the upgrading of the rail between Port Botany and Enfield, that have not been subject to an EA yet, let alone a funding commitment.	The operation of the ILC is not dependent on the upgrade to rail works between Port Botany and Enfield, nor any other projects in the area.		
	What happens to roads in the vicinity of the ILC if the rail is not upgraded or is subject to operating restrictions to minimise noise? Such sensitivity to inputs has to be addressed in the absence of an overall strategy for container movements in the Metro Area.	The FIAB report prepared as part of the Government's Metropolitan Intermodal Freight Strategy for Import and Export Containers (refer Metropolitan Strategy – Transport Strategy for Sydney) supports the need for the Enfield ILC as part of a number of intermodal terminals required to serve the Sydney Basin and to achieve the Governments mode share target.		
	Time-of-day restrictions on rails could boost peak hour and daytime use of local roads.	Noted		
	If rail deliveries do not achieve their desired targets, will the businesses on the ILC turn to greater load consolidation and freight-attracting activities?	Rail deliveries will total up to 10 trains per day. There is no reason why this would not be achieved. If trains are not available, then the freight would continue to be taken into or from the catchment area by truck from Port Botany, as they are now.		
	The EA suggested that the RTA investigate options to improve the operation of a number of intersections surrounding the ILC site. We support this suggestion.	Noted.		
	However, we recommend that the determining authority assessing the ILC proposal place, as a condition of approval, that these intersections be upgraded before the facility is operational. These intersections include, but are not limited to: • King Georges Road and Punchbowl Road • Liverpool Road and Centenary Drive • Roberts Road and Norfolk Road • Roberts Road and Juno Parade and • Liverpool Road and Cosgrove Road.	There is no evidence presented to back up this statement. The traffic assessment suggests that some intersections will have diminished performance in the future. There is a wider network issue that is not a result of the ILC. Intersection improvements will be made to Roberts Road / Norfolk Road in consultation with the RTA, prior to the opening of the ILC.		

	Intersection upgrade would not just be required from intersection capacity operational perspectives, but also from geometric constraint perspective. The EA did not investigate geometric turning adequacy at critical intersections. As will be demonstrated later in this report (Section 3), B-double vehicles are not able, physically, to make some –turning Movements at these intersections due to geometric constraint. In some cases semi-trailer vehicles would have occupy two lanes to make the turns. This is critical, as the EA projected that container truck (B-double and semi-trailers) volumes could be as high as 70 trucks per hour during the commuter peak period. The implications are. concerning for road safety and road efficiency.	See responses relating to similar comments above.		
	2.2.3 Construction activity The construction timetable is only indicative at the moment. This would need to be further developed in order to gain a better picture of the work and time needed. Construction traffic forecasts are based on this indicative timetable, and thus a more detailed construction timetable would give a better picture of construction traffic.	Noted. A draft construction traffic management plan (CTMP) will be undertaken during concept design phase. The successful contractor will undertake a CTMP prior to construction.		
	An assertion is proffered that construction traffic's impact on the locality is set to be minimal. Yet, without the appropriate level of detail, it is not possible to accept this conclusion.	The likely traffic generation during the construction phase (heavy vehicles) was discussed in the EA. It is likely to be less than that during operation. As the ILC contributes to 1% of overall traffic during operation, the impact during construction is likely to be less.		
	2.2.4 Traffic generation The underlying assumption for container activity used in the traffic assessment in the EA assumed 300,000 TEU per annum. This figure is the basis for forecast trip generation (staff traffic and truck traffic) attributable the ILC development. According to the traffic assessment, 300,000 TEU is equivalent to 1,160 truck movements per day, or in the order of 100 trucks per peak hour, plus another 142 car trips per hour.	Noted.		
	The ILC at Enfield would form part of a future network of intermodal facilities within the Sydney metropolitan area. The EA has not described how this particular facility would fit within the wider network of facilities proposed for the metropolitan	Enfield ILC is designed for a throughput of 300,000 TEU per annum with or without other intermodal terminals within the Sydney basin being constructed.		

	area, nor has it considered the traffic impact from this facility, if other parts of the intermodal facility network were not implemented. Greater sensitivity testing seems warranted.			
	For whatever reason, if one or more facilities from the overall network do not proceed, the underlying assumption of an annual demand for 300,000 TEU could be significantly inaccurate. The ILC might represent a larger portion of the freight task, so there would be an increase in the forecast throughput, which in turn would result in an increase in the level of traffic generated by ILC and therefore more traffic impacts.	The Enfield ILC is designed for a throughput of 300,000 TEU per annum and is sited in a location adjacent to its market catchment area.		
	Further, the truck movements generated from the site was estimated from the assumed rail container throughput of 300,000 TEU's per year. All the assumptions regarding truck movements, levels, frequencies etc are derived from this one number. A variation in rail throughput would alter the forecasted levels of truck movements most likely to increase them.	Enfield ILC is designed for a throughput of 300,000 TEU per annum and the traffic impact assessment was based on this figure.		
	With such poor levels of road performance and no program of road capacity improvements to put into the report, there are two implications: • Travel behaviour is not really being described, because congestion interrupts the bases for assigning traffic to routes.	The NETANAL model assignment takes levels of congestion into account.		
	• Once improvements are made, as inevitably they must if the background traffic grows in line with the forecast growth, quite different traffic impacts could result.	Noted. The traffic volumes generated by the ILC development contribute less than 1% to adjacent arterial road network.		
	2.2.5 <u>Unstable road capacity</u> The EA did not assess a scenario where all ILC traffic would access the site from Liverpool Rd via Cosgrove Road, and the Cosgrove Road and Gould Street intersections with Liverpool Road would operated as paired intersections. Under this access arrangement, there would be limited impact to the operation of other nearby Liverpool Road intersections (see Section 4). This option would provide the following benefits:	The analysis of the one-way pair option indicates that while satisfactory operation of the 2 linked intersections (Gould Street and Cosgrove Road) would be achieved in the short term, with background growth the 2-lane eastbound constraint on the Hume Highway would result in unsatisfactory performance in the future without the ILC. Even with 3-lanes provided eastbound, the Cosgrove Road intersection would be at LoS E with 100% of ILC traffic using it. This is the		

		same result as documented in the EA for 100% of ILC traffic using the Cosgrove Road intersection. Therefore it is not feasible to channel all ILC vehicles through this intersection. Furthermore, it would add further pressure to the Hume Highway / Centenary Drive intersection, as a large proportion of ILC trucks would use Centenary Drive. Only allowing access via Cosgrove Road would take traffic off the Centenary Drive / Roberts Road overpass and direct it through the at-grade intersection instead.		
	2.2.6 Cosgrove Road traffic growth It is concluded that the Enfield facility will not significantly cause a growth in traffic levels in the locality. The discussion does not acknowledge that Cosgrove Road is set to experience a large growth in traffic volume - a good proportion of this growth will be cars to and from the ILC. Thus the growth in traffic on Cosgrove Road is not only attributable to natural traffic growth, but also from the ILC.	Agreed that not all growth in Cosgrove Road would be from natural growth, and that the ILC would contribute a small proportion of this traffic.		
	The details have not been presented regarding why specific access options such as new road link and bridges to the facility from adjacent streets were omitted from further investigation. Short statements regarding the basic reasons why certain access points were omitted from the analysis are presented, but these lack detail and still leave questions unanswered. The reasons given include cost, physical constraints, complexity of design, need for acquisition of land etc. These reasons need to be explained more fully, and perhaps some access options should have remained for further analysis.	A more detailed assessment of options was prepared in earlier studies. The information in the EA is a summary. A more comprehensive options report was provided to the RTA which confirmed that the two points of access at Wentworth St and Cosgrove Rd were the optimal solution.		
	2.2.7 Alternative access option - Cosgrove Road/Gould Street The EA did not assess a scenario where all ILC traffic would access the site from Liverpool Rd via Cosgrove Road, and the Cosgrove Road and Gould Street intersections with Liverpool Road would operated as paired intersections. Under this access arrangement, there would be limited impact to the operation of other nearby Liverpool Road intersections (see Section 4). This option would provide the following benefits: • eliminate the need for an additional access from	See previous response to comments		

	Roberts Road • encourage ILC traffic to stay on the state highway network, less opportunity for ILC traffic to intrude into local residential streets • eliminate the additional cost associated with the construction of the overbridge, and • upgrading of Roberts Road intersections not required. Based on pur analysis results, this access option is feasible under existing and future traffic conditions. **3 NETANAL traffic model review** PB undertook a preliminary review of the NETANAL traffic model that formed the basis of traffic forecasts for key regional and local roads surrounding the ILC site. This traffic model review process was based on information and data presented in Chapter 7 of Volume 1 and Appendix B of Volume 2 of the EA. This review does not extend to the forecasting process used by the SKM, nor does it provide advice regarding modelling assumptions, parameters adopted to produce NETANAL traffic forecasts. There was not sufficient information in the report for PB to do this.	Parsons B did not have access to the NETANAL model and therefore this statement is incorrect.		
	2.3.1 Model Network Coverage In general, NETANAL model's geographic coverage is the entire Sydney Metropolitan area. has been focussed on a local area covered by the Hume Highway, Coronation Parade, Punchbowl Road, Boronia Road/ Juno Parade and Centenary Drive. While this network coverage is ideally suited for local traffic issues, however, regional freight/truck movements extend to an area beyond this local area boundary. The EA stated "the bulk of container movement to and from Enfield is expected to be in area immediately west of Enfield. The local government areas of Bankstown and Parramatta account for the largest proportion of activity" (section 4.2.5). To investigate the impact of this reported regional traffic movement, the model area needed to be extended to a wider network incorporating portals to the M4 and M5 motorways. This wider network would have the potential not only to capture regional travel demand, but also to demonstrate model robustness on forecasting regional background traffic.	The focus on the sub-regional area is justified given the localised impact that the ILC would have. The approach suggested by PB would be appropriate for a corridor modelling study or investigation of a new road link, but is not considered necessary for this study which is concerned with local impacts.		

	2.3.2 Model time period The traffic report did not specifically state the time periods represented in the model. As the EA said ILC morning truck peak activity would occur between 7 am and 8 am and evening peak would occur between 5 and 6 evening, these have been assumed as the periods for which the model reports . While this may be the peak characteristic for ILC truck movements, regional traffic data suggest that Sydney's road network has longer peak periods than a conventional one hour. Ideally, peak period for Sydney's network is defined as morning between 7:00 to 9:00 am, and evening between 3:00 to 6:00 pm. These time periods coincide with those adopted by the Department of Planning's Transport & Population Data Centre (TPDC) Strategic Travel Model (STM). NETANAL demand data representing one hour peak (morning and evening) should be benchmarked against TPDC data, so that robustness of travel demand forecast can be judged.	The assessment period was based on the peak hour on the road network. One hour is the standard modelling time frame and standard industry practice in traffic engineering.		
	2.3.3 Model base year While it is desirable to produce base year forecasts as close as possible to the present, there can be issues with the compatibility of data series available for the base year model. The EA nominates 2005 as the base model year, with comprehensive set of project specific traffic count data. The method of deriving the NETANAL base 2005 trip matrix (travel demand) is unknown. This NETANAL 2005 demand should be verified by interpolating demand between 2001 Census and 2006 forecast. Census Journey to work data (JTW) in conjunction with TPDC trip table comparisons might provide a reasonable basis for estimating 2005 base year demand.	The base matrix (2005) has been calibrated for observed volumes in the Enfield area. Previous to use on this project, the matrix had been calibrated for various projects around the Sydney metropolitan area. The degree of matching between observed and modelled flows is shown in Appendix A of the Traffic Report (Appendix B of the EA).		
	2.3.4 ILC site traffic generation The ILC site's traffic generation was estimated on the basis of annual volume of containers (TEUs) moving between the port, the ILC and importers/exporters. The report indicates some 1,160 daily truck movements, with 128 B-doubles (about 11 per cent) are likely to be generated from the ILC. morning peak hour truck movements are then estimated to be about 88, with nine B-doubles. This allocation appears reasonable, given the source of data used in the report. Although	Noted. The impacts of the traffic generated from the ILC have been taken into consideration in the report. Enfield ILC contributes to 1% of the overall traffic on the network, and would result in the proportion of heavy vehicles on Roberts Road and the Hume Highway increasing by less than 1 percentage point. As such it is not considered that “the increase of large vehicles, especially B-double, significantly affects intersection		

	the proportion of ILC truck movements are minor increases in proportion to the total traffic volume, the increase of large vehicles, especially B-doubles, significantly affects intersection operation and road safety.	operation and road safety"		
	2.3.5 Base year traffic counts and trip distribution Base year 2005 classified traffic counts were undertaken at ten intersections and five mid- block locations. The number of count site appears to be adequate for local area model calibration. These counts did not capture regional travel demand, which is an issue for the ILC as it is considered such a critical element of the regional traffic network. RTA has defined 16 screenlines2 across the overall Sydney network. Part of screenlines 1, 5 and 11.would intercept the ILC wider area network and these could have been used for estimating base and future demand at the screenline. Figure 2.1 shows the location of RTA screenlines that could potentially have been used to capture regional demand in the immediate vicinity of the ILC corridor. The base and future demand at these screenlines would improve the view of regional background traffic growth. This regional demand estimate is required in conjunction with the local traffic data already provided in Tables 4.4 and 4.5 of the EA' traffic report.	The counts collected for this project do include regional (as well as local) traffic that use the road network in the vicinity of the ILC. In the context of the study, the model is not being used to forecast traffic diversion due to a new link or other network issue. The impact of the ILC is confined to a relatively small area (see Figure 2.2 of the EA Appendix B, which was discussed with the RTA at the commencement of the study). It is appropriate to concentrate on the sub-regional level rather than the wider network issues.		
	The EA did not provide any evidence of base year 2005 traffic distribution for traffic using key roads including Liverpool Road, Roberts Road and Centenary Drive. A select link analysis on these roads should be undertaken to demonstrate potential origin and destination of trips, more particularly the proportion of through verses local trips.	This level of detail is not considered necessary for assessing the local area impacts..		
	2.3.6 Regional and local network calibration Table 2.1 provides a set of calibrations against which the NETANAL model performance should be measured. These are based on number of sources including UK and New Zealand guidelines. Appendix C of the EA traffic report documented model verification only in the immediate vicinity of the key main and local roads where 2005 counts data were available. The model verification only partially addressed model goodness, on the basis of GEH3 statistics, without validating trip table adjustment	The cited additional calibration measures are only relevant to a regional model assessing wider implications of network change (eg a new link or road closure). The impact of the ILC is limited to the sub-regional level, and the adopted calibration process is appropriate.		

	process measured by regional screenlines. Table 2.1 also identifies criteria where the NETANAL model requires additional calibration. It is granted that calibration standard reported in Table 2.1 is a rigorous process, nevertheless, the NETANAL regional model should satisfy major screenlines calibration standard to demonstrate robustness. Calibration criteria documented in Table 2.1 demonstrated that ILC model needed model validation in a number of additional areas. Without such validation, model forecasting results could create significant concern on ILC traffic assessment. 2.3.7 Future car and freight demand forecast Section 4.2 of the EA traffic report stated that 2016 base trip matrix was developed on the basis of population and employment forecasts provided by the DIPNR. The report did not show potential population and employment growth (between 2005 and 2016) for inner and middle western catchments surrounding the site, predominantly the LGAs of Auburn, Bankstown, Parramatta, Fairfield, Holroyd, Blacktown, Liverpool, Ryde, Concord and Strathfield. A table showing such growth also can be used to verify background traffic growth as reported in Tables 4.4 and 4.5 of the SKM report. The report omitted which vehicle categories were included in the NETANAL base year commercial vehicle trip table, nor did it explain the process applied for developing the future Commercial vehicle trip table. This is particularly important given the nature of ILC project, where future truck demand would play a key role in measuring road network performance. In conclusion, PB recommends additional model documentation that would identify data sources, basic assumptions and the development process of future car and truck trip table used. 2.3.8 Background traffic growth (between 2005 and 2016) In general, peak hour traffic growth on all roads in the local study area is between 1.3% to 1.48%. The robustness of this growth should be verified with the	SKM used trips matrices for future trips relevant to 2016. The 2016 matrices have been used reliably by SKM for several years to forecast future traffic growth. Specific and significant changes were added to the matrices to reflect Port Botany and Sydney Airport (as documented). Car and truck estimates for 2016 were derived from the base 2016 trip matrices, adjusted by the calibration factors derived in the model validation. The truck matrix in NETANAL is used to estimate the effect of heavy vehicles on link and intersection capacity. It is not used on a stand-alone basis. The proportion of heavy vehicles in the traffic stream is one of the inputs to the INTANAL intersection models. See responses to specific comments above. The cited growth rates are in line with expected and observed growth in the area.		

	population and employment growth for LGA's within Sydney's inner and middle western catchments.			
	2.3.9 Assignment method It was not clear which assignment technique and parameters were used in the NETANAL model. An appropriate PCU (passenger car unit) factor should be used for various categories heavy vehicles to estimate congestion level on surrounding network of ILC. The report did not mention how the model handled various types of heavy vehicles PCU factors. Industry practice for PCU equivalence factors are: » Rigid truck 1.3 pcus/truck • Articulated truck 2.3 pcus/truck • B-doubles 3.3 pcus/truck The Port Botany EA discussed at length about future truck sizes increasing to get efficiencies in movements around the Port. However, the larger sizes have significant impacts on traffic facilities like turn bays and de-acceleration lanes, as a single vehicle set can often require all or overflow their capacity.	The truck matrix in NETANAL is used to estimate the effect of heavy vehicles on link and intersection capacity. It is not used on a stand-alone basis. The proportion of heavy vehicles in the traffic stream is one of the inputs to the INTANAL intersection models. The PCU factors are documented in the working paper. The INTANAL default pcu factor of 2 for heavy vehicles was not modified for this project. This is an appropriate average value given the mix of traffic from the ILC both during peak times and over the whole of day.		
	2.3.10 Summary of model review In summary, PB has identified following issues that warrant clarification in the traffic report. This may influence the reliability of the model and its suitability for use to forecast traffic:	See responses to specific comments above.		
	• source and method of base 2005 trip table development'done separately for cars and Trucks	See responses to specific comments above		
	• NETANAL 2005 demand should be verified by interpolating demand between 2001 Census and 2006 forecast. Census Journey to work data (JTW) in conjunction to TPDC trip table should provide a reasonable basis for estimating 2005 base year demand.	See responses to specific comments above		
	• counts data did not capture regional travel demand which is a critical issue for the ILC. RTA has defined 16 screenlines across the overall Sydney network. Part of RTA screenlines 1, 5 and 11 would intercept ILC traffic on the wider area network (see Figure 2.1).	See responses to specific comments above		

	• Table 2.1 identified criteria where NETANAL model requires additional calibration • documentation of the population and employment growth between 2005 and 2016 for inner and middle western catchments, predominantly the LGAs of Auburn, Bankstown, Parramatta, Fairfield, Holroyd, Blacktown, Liverpool, Ryde, Concord and Strathfield, is missing			
	• source and method of estimating future 2016 car and truck trip tables used to estimate background traffic growth has not been documented.	See responses to specific comments above		
	• lack of documentation on traffic assignment technique and conversion PCU (passenger car unit) factors for various truck categories The traffic model used to analyse traffic assessment included in the EAR raised a number of matters of concern. These concerns include the assumptions behind the modelling, the scope of the modelling, the modelling methodology, the assessment parameters as well as the conclusions drawn from the assessment.	See responses to specific comments above		
	Some of these identified deficiencies may on their own be of minor significance. However, when considered cumulatively they indicate that it is just not possible to have confidence about the findings of the traffic assessment. Given the importance of traffic as an issue for this proposal, this is a matter of significant concern.	The traffic impact assessment undertaken for the ILC was considered to be appropriate.		
	3. Intersection impacts <u>3.1 Large vehicles at critical intersections</u> The traffic assessment in the EA did not undertake swept path analyses for large vehicles such as semi-trailers and B-double vehicles at critical intersections. This is a major deficiency in the traffic assessment, in particular, when our analysis results demonstrate that semi-trailer and B-double vehicles would have difficulty negotiating some turning movements and in some cases it is physically impossible to make the turn at both the Roberts Road- Norfolk Road and Cosgrove Road-Liverpool Road intersections. This problem is greater at the Roberts Road-Norfolk Road intersection due to small turning radii at this intersection.	Swept path analyses were undertaken subsequent to the submission of the EA to determine possible traffic management measures for the Roberts Rd/Norfolk Rd intersection. In addition, Council and the RTA has previously (June 2005) undertaken tests with 25m B-doubles at Roberts Road / Norfolk Road. The testing indicated problems with the left turn into Norfolk Road. SPC expects this left turn will need to be re-configured. Council indicated no problems with other movements at this intersection. . See response above		

	Council identified three intersections where future freight traffic was of particular concern because current arrangements might be impacted by increased large vehicles movements. These are: • Roberts Road and Norfolk Road • Roberts Road and Juno Parade and • Liverpool Road and Cosgrove Road. <u>Summary of swept path review</u> Roberts Rd/Norfolk Rd, Cosgrove Rd-Hume Hwy, Juno Parade/Roberts Rd would need to be upgraded if they were to be safely used by heavy vehicles. Whilst some of the turning movements are physically possible within the intersection, it is undesirable for a left turn to be made from through lanes so large vehicles may turn. It can increase collision risk and put vulnerable road users such as pedestrians and cyclists at risk, and reduce intersection capacity. Similarly, a right turn should not have to be made from through lanes, especially when heavy vehicle movements of more than 1,000 vehicles per day are expected. The EA has not addressed this part of the assessment. This is a major deficiency in the assessment, in particular when the Roberts Road-Norfolk Road and Liverpool Road-Cosgrove Road intersections are being proposed as access points to the proposed ILC site. At these two intersections some semi-trailer and B-double turning movements are not physically possible due to inadequate geometric clearance. The Roberts Road-Norfolk Road intersection is more critical due to its smaller turning radii. It is recommended that Roberts Road should not be used as an access to the site, without upgrading the intersection with Norfolk Road to accommodate large truck movements. **4. Liverpool Road access investigation** <u>4.1 EA proposed access arrangement</u> Under the current access arrangement as described in the EA, the proposed ILC would have two access points via Wentworth Street/Norfolk Road/Roberts Road and Cosgrove Road. The Norfolk Road access is promoted as the key access point where it would be linked internally via an overbridge across the marshalling yard to the eastern part of the ILC	See responses above. The intersection will be re-designed in consultation with the RTA to accommodate the left turn from Roberts Road to Norfolk Road. Noted.		

	site and to Cosgrove Road. It is considered that the proposed access arrangement is not ideal for the following reasons: • this access option would involve traffic accessing the intersection of Roberts Road and Norfolk Road where the current geometrical layout does not permit B-double to make the left turn and a semi-trailer would need to occupy the adjacent lane to make the same turn severely affect the capacity of this intersection • there is limited scope to widen the Roberts Road-Norfolk Road intersection • there would be additional cost to construct the overbridge to connect the eastern and western parts of the ILC facility • other Roberts Road intersections would need to be improved and widened to improve intersection operation • there is potential for ILC traffic to intrude into residential streets such as Norfolk Road, Rawson Street and Juno Parade/Boronia Parade. The EA assesses the impact to Cosgrove Road by varying the volume of ILC truck traffic using the Cosgrove Road access. It was found that with 100 per cent of ILC trucks diverted to Cosgrove Road, this intersection with Liverpool Road would with LoS E in the evening peak period. With 50 per cent of trucks, the average delays would be reduced to close to acceptable level. But the EA did not assess the option where Cosgrove Road and Gould Street would operate as paired intersection with Liverpool Road. In the light of the above, PB has undertaken separate analysis to determine the feasibility of having the Cosgrove Road and Gould Street intersections with Liverpool Road operating as	The intersection will be re-designed in consultation with the RTA to accommodate the left turn from Roberts Road to Norfolk Road. Noted. Noted. No detail provided on which intersections PB is alluding to. No other intersections with Roberts Rd were assessed in the traffic study as requiring physical improvements. A local area traffic management plan will be developed with the RTA and councils. Juno Parade / Boronia Road is a state road and a designated B-double route. Norfolk Road and Rawson Street have 3-tonne load limit roads. SKM analysis of the one-way pair option indicates that while satisfactory operation of the 2 linked intersections (Gould Street and Cosgrove Road) would be achieved in the short term, with background growth the 2-lane eastbound constraint on the Hume Highway would result in unsatisfactory performance in the future without the ILC. Even with 3-lanes provided eastbound, the Cosgrove Road intersection would be at LoS E with 100% of ILC traffic using it. This is the same result as documented in the EA for 100% of ILC traffic using the Cosgrove Road intersection. Therefore it is not feasible to channel all ILC vehicles through this intersection. Noted. SKM undertook a similar analysis post submission of the EA. See response above.		

	a paired intersection. 4.2 Alternative Liverpool Road access PB submits, as an alternative to the EA proposed access arrangement, for the primary access to the ILC to be via Cosgrove Road and Gould Street. Under this proposal, Cosgrove Road and Gould Street would operate as one-way link pair, where the traffic along Gould Street would flow in the northbound direction and Cosgrove Road would only allow southbound traffic. Both intersections with Liverpool Road would operate under paired and coordinated signal control. The EA proposed access via Norfolk Road would not be required under the PB proposal, therefore, the overbridge across the marshalling yard would also not be required. The southern section of Cosgrove Road, where it intersects with Punchbowl Road, could be provided as an emergency access only 4.2.1 Intersection performance - future base case Under anticipated future traffic conditions (without ILC development) the three major intersections within the coverage area of the simulation model would operate with LoS D or better in either peak period. At these intersections, generally both peak periods have similar operating conditions except at Cosgrove Road where the morning peak period has lower delays than the evening peak period. During the evening peak period, these intersections would operate at near capacity. **SUMMARY and recommendations** 5.1.1 Confident in the EA There is a lack of confident in the EA due to a number of identified deficiencies in the traffic assessment and modelling undertaken in the EA. • The underlying assumption for container activity of 300,000 twenty-foot equivalent units (TEU) was used to generate traffic from the proposed development. But it did not assess	Noted. See response above. The western access and bridge is required for operational efficiency and OHS requirements. This intersection could be used in case of an emergency. During operation of the site, ILC traffic will be prohibited from using this intersection to access the site. This will be enforced via traffic management measures. The intersections referred to were not listed. See previous comments on specific issues raised by Parsons B. The ILC is designed for a throughput of 300,000 TEU per annum .		

	the traffic impact as a direct result of the change in the assumed throughput of 300,000 TEU due to other part of the future network of the intermodal facilities not proceeding or a variation in the rail throughput.			
	• The EA did not investigate fully the opportunity to have Cosgrove Road (with Gould Street) as the primary access into the site. Our analysis results indicate that this is a feasible solution under both the existing and future conditions. This option does not require upgrade to other intersections which would be required under the EA proposed access arrangement e.g. Roberts Road-Norfolk Road intersection.	This was assessed subsequent to the submission of the EA and has been addressed as specific response to comments above.		
	• The EA traffic models for the morning and evening peak periods cover the one-hour time period within each of these peak periods however Sydney road network h as longer commuter peak periods - ideally the morning model should have two-hour peak period from 7:00am to 9:00am while the evening peak periods should have three-hour peak period from 3:00pm to 6:00pm.	The assessment period was based on the peak hour on the road network. One hour is the standard modelling time frame and standard industry practice in traffic engineering.		
	• The EA traffic model output was not bench marked against Transport & Population Data Centre's Metropolitan Strategic Travel Model. • It is unknown how's the existing base year trip matrix was derived.	The base matrix (2005) has been calibrated for observed volumes in the Enfield area. Previous to use on this project, the matrix had been calibrated for various projects around the Sydney metropolitan area. The degree of matching between observed and modelled flows is shown in Appendix A of the Traffic Report (Appendix B of the EA).		
	• The EA traffic model does not appear to have captured the effects of regional traffic surrounding the ILC site as the models were calibrated using counts undertaken within the immediate vicinity of the site.	The focus on the sub-regional area is justified given the localised impact that the ILC would have. The approach suggested by PB would be appropriate for a corridor modelling study or investigation of a new road link, but is not considered necessary for this study which is concerned with local impacts.		
	The use of RTA screenlines would help this regard. The EA traffic model has not meet major screenlines calibration standards resulting in less robust modelling results.	This level of detail is not considered necessary for assessing the local area impacts.		

	• The EA indicated that the 2016 base trip matrix was developed using population and employment forecasts provided by DIPNR, but has not shown the changes between 2005 and 2016.	SKM used trips matrices for future trips relevant to 2016. The 2016 matrices have been used reliably by SKM for several years to forecast future traffic growth. Specific and significant changes were added to the matrices to reflect Port Botany and Sydney Airport (as documented).		
	• The EA did not indicate which vehicle categories were included in the traffic models commercial vehicle trip table nor did it explain the process applied for developing the future commercial trip table.	Car and truck estimates for 2016 were derived from the base 2016 trip matrices, adjusted by the calibration factors derived in the model validation. The truck matrix in NETANAL is used to estimate the effect of heavy vehicles on link and intersection capacity. It is not used on a stand-alone basis. The proportion of heavy vehicles in the traffic stream is one of the inputs to the INTANAL intersection models.		
	• It is also unclear of the traffic assignment technique used and how commercial vehicles were converted into equivalent passenger car unit.	The truck matrix in NETANAL is used to estimate the effect of heavy vehicles on link and intersection capacity. It is not used on a stand-alone basis. The proportion of heavy vehicles in the traffic stream is one of the inputs to the INTANAL intersection models. The PCU factors are documented in the working paper. The INTANAL default pcu factor of 2 for heavy vehicles was not modified for this project. This is an appropriate average value given the mix of traffic from the ILC both during peak times and over the whole of day.		
	5.1.2 <u>Adequacy of intersections</u> The EA recommended for a number of intersections to be upgraded as a result of growth in the background traffic and traffic from the ILC, but did not indicate what type of grade are required rather than three through lanes a t the Cosgrove Rd-Liverpool Rd intersection.	The traffic assessment suggest some intersections will have diminished performance in the future. This is a wider network issue.		
	The EA traffic assessment did not undertake swept path analyses for large vehicles to determine the adequacy of geometric clearance at critical intersections. Our analysis indicate that some turning movements undertaken by semi-trailers and/or B-double vehicles are either physically impossible or would require the vehicle to occupy the adjacent lane to negotiate the turn. The intersections with this issue are Roberts Road-Norfolk Road and Cosgrove Road-Liverpool Road.	See responses to previous comments.		

	5.1.3 Alternative access arrangement Cosgrove Road together with Gould Street operating as a paired and coordinated signalised intersection with Liverpool Road would be a technically feasible option to provide access to serve the ILC development. PB's simulation results demonstrate that under this proposed arrangement, all intersections would operate with satisfactory conditions with spare capacity in both the future base case (without ILC) and future development case (with ILC). The proposed change at Cosgrove Road and Gould Street would have limited impact to the Centenary Drive and Roberts Road intersections with Liverpool Road. 5.2 <u>Recommended further actions</u> It is recommended that a number of key intersections surrounding the proposed ILC site be upgraded in order to improve intersection operational capacity and to permit large vehicles to negotiate some turning movements. These intersections include: • King Georges Road and Punchbowl Road • Liverpool Road and Centenary Drive • Roberts Road and Norfolk Road • Roberts Road and Juno Parade and • Liverpool Road and Cosgrove Road. However, if the access to Roberts Road is not provided, then intersection upgrades at Roberts Road intersections would not be required due to the ILC. It is also recommended that the access point be provided via Cosgrove Road/Gould Street at Liverpool Road. Our analysis results demonstrate that with Cosgrove Road and Gould Street operating as a paired intersection with Liverpool Road and as a one-way link pair would have limited impact to other nearby Liverpool Road intersections under existing and future traffic conditions. This access option would have benefits such as: • eliminate the need for an additional access from Roberts Road encourage ILC traffic to stay on the state highway network, less opportunity for ILC traffic to intrude into local residential streets eliminate the additional cost associated with the construction of the overbridge, and upgrading of Roberts Road intersections not required.	See responses to previous comments . See responses to previous comments regarding physical turning movements at intersections. No analysis was presented on turning movements at King Georges road / Punchbowl Road and Liverpool Road / Centenary Drive. See response to previous comments regarding access options and analysis of the two-way pair.		

Appendix C NSW Government Responses

Submissions Govt Dept/agency- Air Quality

Issue Category	Comments	Response	Stakeholder ID	Name
Air Quality	When considering a development application it is important to examine both the incremental increases in pollutant exposure as well as the resultant level of total air pollution exposure. Compliance with a criterion of 50µg/m^3 is not necessarily health protective.	The air quality assessment does consider both the incremental increases in pollutant exposure and total pollutant exposure. Specific to PM10 for the construction and operational phases and NO_x/NO_2 for the operational phase, the assessment models 1 hour impacts using contemporaneous background air quality and meteorological data as per DEC's Approved Methods. With respect to PM_{10} the cumulative assessment compares 24 hour impacts with the relevant criteria of 50µg/m^3.	833	NSW HEALTH **Submission No 318**
	Further, the proponent has incorrectly adopted National Environmental Protection Measure goals in allowing exceedances for PM10 page 12.2 (Table 12.1) of the assessment report. The NEPM goals relate to achievement of standards across an airshed and are not intended for application to project specific or point source pollution. DEC criteria do not allow exceedances if these standards are adopted to assess project specific pollution.	For the PM10 air quality assessment (both construction and operational) we do use the NEPM criteria of 50 ug/m^3 (24 hour) with 5 exceedances allowed rather than the DEC criteria of 50 ug/m^3 with no exceedances allowed. The reason for this is that the DEC criteria are considered too stringent for assessment of construction phase PM10. As a demonstration of this the background air quality data for Lidcombe which was used for modelling purposes and is shown in Appendix F of this report, provides highest background PM10 (24 hour) approaching 40 ug/m^3. In modelling PM10 impacts it can be seen that an impact from construction greater than 10 ug/m^3 could result in a single exceedance of this criteria. An allowance of 5 exceedances per year is considered more reasonable and workable, particularly in light of the fact that in many other jurisdictions eg. US and Qld (within Australia) far less stringent criteria are applied, eg. 150 ug/m^3. For clarification purposes in Tables 6-5 and 6-6 of the Air Quality Assessment (Appendix F of the EA) where it is stated for example that there are two exceedances of the 50 ug/m^3 criteria, this should be interpreted as within the five allowable exceedances not a further two exceedances over and above the five allowed.		
	The modelling assumptions (pages 12.9 - 12.12) do not appear to follow DEC guidelines. The restriction of data to only when wind speed is less than 5m/s (and possibly also restricted to wind direction not including 210degrees to 340degrees) rather than modelling all weather conditions needs to be further justified. The predicted construction air quality impacts thus reflect average background air quality with the addition of construction-generated pollutants under conditions of wind speed less than 5m/s and possibly only from NNW to SW. This demonstrates significant exposure to PM10 of up to 70ug/m3 over 24-hours in residential areas, which represents more than a doubling of the current maximum exposure. Increased exposure to PM10 of this magnitude may increase the risk of health effects such as asthma, exacerbation of chronic obstructive pulmonary diseases, and irritation of the eyes and upper airways within the surrounding local community. However if all weather conditions were taken into account, predicted increments and associated health impacts may be higher.	The PM_{10} modelling methodology for construction phase impacts is considered reasonable, whereby initially the modelling was undertaken with no dust controls measures in place, and as expected impacts showed exceedance of the relevant criteria. Various dust control measures were progressively implemented until a level of control was achieved that showed impacts could be effectively managed. These controls included sealing of some surfaces that would be otherwise left unsealed, high level watering of the site and wind speed and wind direction restrictions, which may be required, however, not necessarily. In reality dust impacts will be managed by the physical controls assumed in the modelling and a sophisticated real-time PM_{10} monitoring program which will advise site operators of any dust impacts within sensitive receiver locations should these occur. The site operator can then (almost immediately) alter construction works which may include restriction of works in certain wind conditions such that impacts are effectively manager, without any exceedance of the relevant criteria.		
	Health would like to see a detailed and proactive strategy to reduce	With respect to this comment it is noted that the PM_{10} criteria of		

Issue Category	Comments	Response	Stakeholder ID	Name
	air impacts. The proponent's suggested approach has the potential to allow impacts to occur before specific measures have been developed and implemented, increasing the likelihood of health effects on and irritation within the local community. The development of the Dust Management Plan should include all possibilities including the stopping of construction until a solution has been obtained, should off-site air impacts be significant.	50 ug/m^3 (24 hour) is a very stringent criteria and generally as PM_{10} levels approach the criteria value there would be not perceived deterioration in air quality that would enable an operator to pro-actively implement controls to mitigate impact. It is noted, however, that the PM_{10} criteria is a 24 hour criteria and site operators will have instant access to real-time PM_{10} data under the monitoring program proposed. As such as instantaneous PM_{10} levels reach some pre-determined threshold value, control measures can be implemented such that total PM_{10} impacts within the 24 hour period can be mitigated such that the criteria is achieved.		
	In NSW Health's Director-General's requirements we requested that incremental exposure to PM2.5 also be assessed, as this is a better indicator of exposure to vehicle emissions than PM10 and this has not been undertaken. However NO2 is also a reasonable indicator of exposure to vehicle emissions and this has been modelled, and is probably an adequate indicator of operational phase air quality health impacts.	It seems from this comment that NSW Health is comfortable with the assessment of NO_2 in place of $PM_{2.5}$ for the operational phase of the project. For the construction phase it is unclear whether a $PM_{2.5}$ assessment is expected, however, as the majority of impact from the construction phase will be via the potential release of fugitive particles (dust), the assessment of PM_{10}, TSP and dust deposition are considered adequate for this purpose.		
	It is important to reduce these operational air quality impacts as they are ongoing, potentially more toxic than construction phase impacts (being comprised principally of diesel emissions), and also as sensitive sites such as Strathfield Girls High and St Anne's Primary are located within some of the areas expected to have substantially increased exposure.	The EA provides a framework for the management of operational phase air quality impacts. This will be further developed within Operational Environmental Management Plan.		
	Road Traffic Air Quality Impacts The proponent has modelled road traffic air quality impacts in isolation and the levels estimated indicate relatively small incremental increases in PM10 & NO2 . However, as noted in the introduction, we have concerns that the EA underestimates the traffic impact on local roads, which may have the effect of underestimating the local pollutant impacts.	The assessment of road traffic air quality impacts was based on traffic modelling for the project which was outlined in Chapter 7 of the EA. We believe it accurately reflects the traffic air quality impacts which will be very minor.		
	To fully consider the operational phase exposure to air pollutants the local road pollutant impacts should be added to on-site operation impacts and considered as part of an assessment of cumulative impacts.	The road traffic modelling uses a different assessment technique and model to the modelling of on-site impacts, and such it is not straight forward to consider the cumulative effect of these sources in any quantitative way. It is noted, however, that the incremental change in impact associated with changing vehicle numbers on the local road network is very small, and as such the cumulative effect of on-site emissions and those associated with changing vehicle numbers on the local road network would not be significant.		
	Cumulative Impacts We note that the estimates of increased operational phase exposure to air pollutants has not included emissions from increased truck movements on local roads or from increased train movements. Thus the increment in community exposure to air pollutants is likely to be higher than reflected in the EA estimates, particularly in the north-west of the site (additional road emissions) and south-east of the site (additional train emissions). This should provide further impetus to reducing on-site air pollution emissions.	Refer to response above.		

Submissions Govt Dept/agency- Air Quality

Issue Category	Comments	Response	Stakeholder ID	Name
Air Quality	For operation of the project, the DEC's principal concerns are noise impacts and air quality issues. The assessment of air quality needs additional work in order for impacts of the proposal to be fully characterised. As it stands, the assessment predicts impacts will occur but indicates that with appropriate mitigation the proposal could proceed without impact. However, it is not clearly shown that there would not be impacts. Importantly, it appears that the wrong impact assessment criteria for PM10 has been used throughout the air quality assessment. A good mitigation strategy appears necessary to prevent impacts from both construction and operation activities. Thus the DEC recommends that a revised air quality impact assessment that demonstrates compliance to appropriate criteria should be developed in parallel (or iteratively) with: ▪ development of a more detailed construction and operation air quality management plans; and ▪ development of a refined air quality impact mitigation strategy to prevent impacts; and, ▪ All technical issues (including impacts from off site activities) should be addressed through additional assessment work. However, the DEC considers that further assessment work is required to develop a final suite of mitigative actions that will ensure that appropriate air quality outcomes are achieved during the construction phase. Importantly, predictions of 1 to 27 days annually in excess of 24-hour PM10 criteria (with and without mitigation in place) require refined modelling approaches, greater refinement of modelling assumptions or a revision of operation and construction plans or a revision of the mitigation strategy, or all these. The DEC considers that further assessment work is required to address the following concerns: ▪ The AQIA has adopted an incorrect impact assessment criterion for 24-hour average PM10 emissions, based on NEPM reporting criteria. The correct assessment criterion does not allow 5 days annually in excess of the criteria. Adoption of the incorrect assessment criteria has a	For the PM10 air quality assessment (both construction and operational) we do use the NEPM criteria of 50 ug/m^3 (24 hour) with 5 exceedances allowed rather than the DEC criteria of 50 ug/m^3 with no exceedances allowed. The reason for this is that the DEC criteria is considered too stringent for assessment of construction phase PM10. As a demonstration of this the background air quality data for Lidcombe which was used for modelling purposes and is shown in Appendix E of the PPR to provide highest background PM10 (24 hour) approaching 40 ug/m^3. In modelling PM10 impacts it can be seen that an impact from construction greater than 10 ug/m^3 could result in a single exceedance of this criteria. An allowance of 5 exceedances per year is considered more reasonable and workable, particularly in light of there fact that in many other jurisdictions eg. US and Qld (with Australia) far less stringent criteria is applied, eg. 150 ug/m^3. For clarification purposes in Tables 6-5 and 6-6 of the Air Quality Assessment (Appendix F of the EA) where it is stated for example that there are two exceedances of the 50 ug/m^3 criteria, this should be interpreted as within the five allowable exceedances not a further two exceedances over and above the five allowed. Detailed Construction and Operational phase management plans would be prepared. The Construction EMP will include a Dust Management Plan to be implemented during construction and will include the identification of a detailed construction methodology, modelling of dust emissions during that construction with the development and implementation of further mitigation measures to ensure the DEC defined criteria are met. Potential exceedances of dust criteria will be managed by various means, including the physical controls assumed in the modelling and a sophisticated real-time PM_{10} monitoring program which will advise site operators of any dust impacts within sensitive receiver locations should these occur. The site operator can then (almost immediately) alter construction works which may include restriction of works in certain wind conditions such that impacts are effectively managed, without any exceedance of the relevant criteria. A protocol will be devised to determine the appropriate response to readings greater than 50 ug/m3. For the PM10 air quality assessment (both construction and operational) we do use the NEPM criteria of 50 ug/m^3 (24 hour) with 5 exceedances allowed rather than the DEC criteria of 50 ug/m^3 with no exceedances allowed. The reason for this is that the DEC criteria is considered too stringent for assessment of construction phase PM10. As a demonstration of this the background air quality data for	825	DEC **Submission No 309**

Issue Category	Comments	Response	Stakeholder ID	Name
	number of implications, including that additional mitigation may be required to avoid impacts. Clarification is also required regarding the impacts for stage 1 and 2 of construction and for impacts from off site activities because it is possible that 5 exceedences of the PM10 have been allowed for by using incorrect criteria.	Lidcombe which was used for modelling purposes and is shown in Appendix E of the PPR to provide highest background PM10 (24 hour) approaching 40 ug/m^3. In modelling PM10 impacts it can be seen that an impact from construction greater than 10 ug/m^3 could result in a single exceedance of this criteria. An allowance of 5 exceedances per year is considered more reasonable and workable, particularly in light of there fact that in many other jurisdictions eg. US and Qld (with Australia) far less stringent criteria is applied, eg. 150 ug/m^3.		
	▪ The assessment does not adequately consider the air quality impacts of the proposed land farming operations. Clarification is required on what will occur during land-farming (on site soil remediation) and whether some 37,000 m3 of unsuitable material is contaminated and if so with what (AQIA pg10). The potential impacts of contaminated materials in dust must also be considered in greater detail. Additionally, it is unclear which Appendix C related to.	The unsuitable fill material does not relate to contaminated soils, but rather geotechnical suitability. All contaminated land will be treated on site (through land farming) or removed off-site for treatment and disposal at suitable locations. There was considered to be no need for a detailed assessment of air quality impacts from contaminated soil to be undertaken. Requirements for management of dust impacts during remediation would be detailed in the RAP. The Appendix C referred to is Appendix C of the AQIA.		
	▪ Clarification is necessary on applied in the AQIA. For example, at part 5.7.6 it appears hourly background PMi0 data are appropriately added each hour to the hourly predictions of impacts from the site. However, Part 6.5 appears to state that a constant background level of 40 ug/m3 is applied to all predictions in the assessment, (pg 36 and 62).	All modelling assessments (both construction- PM_{10} and operational – PM_{10} and NO_2) are contemporaneous where the modelling uses hour by hour background pollution and meteorological data, and impacts are modelled on an hour by hour basis. The reference to a background PM10 level of 40 ug/m3 (24 hour) is a general statement, as this approximates the highest 24 hour background concentration used in the modelling assessment and in some cases the high background has a large bearing on the highest predicted impacts. A separate attachment (Appendix F) has been prepared which describes the contemporaneous modelling approach for PM_{10} construction phase air quality impacts.		
	• The mitigation strategy for construction phase air quality impacts includes restricting activities during certain wind conditions. It is assumed from AQIA that restrictions to activities are intended to apply when either the wind speed is greater than 5 m/s (in any direction) or the wind direction is in the sector 210° to 340°, and also when both conditions apply. However, the AQIA text (p.44) suggests that both conditions need to apply before any restrictions take place. It is important that this is clarified as the air quality impacts of the proposal will be influenced by how and when this mitigation measure is applied.	The reference on p44 is saying that while construction activities in Stages 3 and 4 should observe the same generic dust control mechanisms, this does not extend to the need for wind speed or wind direction controls. With respect to Stages 1 and 2 it is not prescriptive that these wind restrictions will be required either, but they are provided to show that (by modelling) worst-case impacts can be mitigated.		
	▪ The AQIA asserts that the wind speed limitations would not be needed for stage 3 and 4 of construction. The DEC accepts that this is likely to be true for most of the period of stage 3 and 4 construction, but this is not reasonably demonstrated and needs to be adequately justified.			
	▪ The AQIA indicates that "no comparison can be made with the relevant criterion" in relation to 24-hour PM10 standards (pg 32). However, TEOM collected data for	We acknowledge that 24 hour PM10 data is available from Lidcombe and Earlwood, and that hourly and daily PM10 background data for Lidcombe has been used in the		

Issue Category	Comments	Response	Stakeholder ID	Name
	PM10 is available from DEC for Lidcombe and Earlwood, thus it is not understood why such a comparison cannot be made. The DEC does not have the expertise to offer advice on traffic volume predictions, thus DEC provides only the general comment that more detail is needed to justify the emissions factors used and more detail about the modelling undertaken should be provided. In relation to emission factors, the DEC notes that the AQIA adopts factors based on those used in a separate management plan for the M5 East Motorway. This may not be applicable due to differing context and therefore the AQIA should instead present the root source of the factors used for the assessment. It is also noted that US EPA Tier 3 factors may appear too low for the equipment that will be used at ILC due to differing national standards. Nonetheless, the DEC recognises that changes to the emission factors or modelling method would only change the absolute values predicted, but not the relative difference between the existing and proposed situations.	contemporaneous assessment of impacts. The vehicle emission factors used for the off-site air quality impact assessment were sourced from the M5 East Air Quality Management Plant (M5 East AQMP). The M5 East AQMP states that the emission factors were supplied by the EPA with the following references: Xu, C (2001a) 2002 Emission Factors. NSW Environment Protection Authority, personel communications. The three reports from which these factors have been derived are in the process of formal peer review and are: *Xu, C (2001) Revision of Emission Factors for Existing Late Model Petrol Cars. MVEPS Improvement Program Technical Report 1; Xu, C (2001) Revision of Emission Factors for Future Model Petrol Cars with Scenario Projections. MVEPS Improvement program Technical Report 2. Xu, C (2001) Development of Diesel Vehicle Emission Factors. MVEPS Improvement Program Technical Report 4.* One clarification is that the air quality assessment report in Table 7-9 states that the emissions are for Highway/Freeway. They are in fact for “Congested Arterial Roads” which are considered to accurately reflect the major road network surrounding the ILC. It is also noted that the emission factors used were projected by the EPA for the 2002 road fleet whereas the ILC assessment year is 2016 when it is expected that fleet emissions would be lower. With respect to the on-site equipment US EPA provided the only available set of "robust" emission factors for the type of equipment proposed, and Tier 3 best co-incided with the likely year when this equipment would be required at Enfield. It should be noted in terms of NO_2 the predicted operational phase impacts (on-site equipment / trucks / trains) are well below DEC 1-hour and annual criteria, at most 77 % of the 1-hour criteria, for the worst-case including background levels. In the case of PM_{10} where impacts are only marginally less than the 24-hour criteria it should be noted that there is no difference in particulate emission factors for Tier 0, 1, 2 and 3 equipment, for the relevant engine sizes considered in the assessment. At a meeting with the DEC comment was also made with respect to locomotive emission factors in particular the sulphur content of diesel, in so far as how this would impact on particulate emissions. The locomotive emission factors were taken from NPI, 1999 and controls applied as per USEPA420-F-97-051. The quoted diesel sulphur content in NPI, 1999 is 0.18 % which is less than that which will be used by locomotive diesel at the time the ILC becomes operational. Hence the sulphur content data used is considered conservative in terms of both calculation of particulate emissions and SO_2.		

Submissions Govt Dept/agency- Air Quality

Issue Category	Comments	Response	Stakeholder ID	Name
	As with prediction for construction phase impacts, the operational phase modelling has adopted the incorrect impact assessment criterion for PM10. The DEC also notes off site operational 24-hour average PM10 impacts appear to occur for 3 days annually. In is not clear, though, whether this impact will occur for 8 days annually (because 5 exceedences have been allowed for by using incorrect criteria), or whether it is in fact 3 days. Either way, it would be appropriate for further refinement of the modelling or revision of the Intermodal Terminal operation to demonstrate that the proposal will not exceeded criteria.	The PM10 criteria of 50 ug/m3 (24 hour) is not exceeded by worst-case impacts (background + impact levels) on any occasion (nil exceedance) within residential areas surrounding the ILC. This is shown in Table 7-7 and Figure 5 of Appendix F (Air Quality Study).		
Air Quality	RailCorp does not have provisions about air quality management as part of its operating licence responsibilities. SPC will need to deal with this	Noted. Issues of rail corridor operation should be considered by a wider group than SPC which should include all relevant agencies, including RailCorp.	582	Rail Corp **Submission No 180**

Submissions Govt Dept/Agency Approval processes

IssueCategory	Comments	Response	Stakeholder ID	Name
approval processes	Rail connections and operations at Enfield- approval processes required, leasing requirements and need for discussion as detailed planning takes place; Acoustic walls- asks for a condition of consent about the northern wall (located on RailCorp land) that addresses a range of aspects. SPC needs to apply for a licence or lease for the structure; Road overbridge for Wentworth Ave access-Confirms deed of agreement. However notes that the deed does not provide to SPC, RailCorp's approval of the structure. Requests a condition to address a range of matters relating to the bridge, and obtain RailCorp's prior approval for rail related aspects of the structure; Transmission line and other infrastructure- RailCorp seeks a condition of consent that the relocation of its electrical, signalling and communication or other utilities infrastructure will require consultation with and approval by RailCorp. Drainage and flood mitigation-Consent condition requiring SPC to submit detail plans for flood and mitigation works to RailCorp for assessment and endorsement. Contamination aspects- Recommends a consent condition re no transfer of contaminants onto adjoining areas. Cumulative impacts- Report does not address cumulative impacts associated with increased usage of RailCorp network at a regional level, with particular emphasis on freight distribution and noise. Acknowledges this may be outside scope of consent but believes there should be an interagency working party to address the consequential impacts on regional rail corridors associated with projects that contribute to the NSW Government's Port Growth Plan	Acknowledged Further consideration and design of the proposed noise wall on RailCorp land is required during detailed design including the requirement for licenses or leasing of land. Consultation with RailCorp required during detailed design of the proposed rail bridge. Approval for construction required. Consultation and approval required from RailCorp for relocation of electrical signalling, communication equipment and other utilities infrastructure. Detailed drainage plans to be submitted to RailCorp on completion, for its information. Remediation Action Plan to be prepared and site to be remediated prior to construction commencement. Sydney Ports is prepared to participate in any interagency working group established to address rail noise impacts along the dedicated rail freight line corridor.	582	RailCorp **Submission No 180**

Submissions Govt Dept/Agency: COMMUNITY & ECOLOGICAL AREA

IssueCategory	Comments	Response	Stakeholder ID	Name
Community and Ecological Area	The proposed community and ecological area for example may be considered as an alternative location for the footbridge and Wagon Repair Shed.	Relocation of part of the footbridge to the community and ecological area would be considered during detailed design. Due to extensive termite damage in the timber elements of the wagon repair shed this may not be possible. There is the potential, however, for elements of it to be recycled on site in the form of amenities within the community and ecological area.	827	NSW Heritage Office **Submission No 141**

Submission Govt Dept/Agency: CONTAMINATION

Issue Category	Comments	Response	Stakeholder ID	Name
contamination	A remediation action plan (RAP) should be developed for the site in accordance with SEPP 55 and the DEC's Guidelines for Contaminated Sites. This RAP should address the contamination identified in site investigations and address issues raised in the site audit reports undertaken for the former marshalling yard and the DELEC site. The RAP should also incorporate contingency procedures for managing contamination that is discovered during site development works.	A RAP would be prepared by a suitably qualified contaminated land consultant in accordance with Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites, 1997 prior to the commencement of earthworks. This would include specific measures to remediate contamination hotspots identified, cleanup criteria to be achieved and procedures for the identification and management of potential contamination unearthed during remediation and earthworks.	825	DEC **Submission No 309**
	A site auditor must be engaged to review the adequacy of the RAP. Following the remediation of the site, the site auditor must provide the consent authority with a site audit statement and accompanying site audit report to demonstrate that the site has been made suitable for industrial use.	A validation report will be prepared to ensure the works specified by the RAP have been undertaken satisfactorily.		
	The RAP should address (but not limited to) the following issues: Investigation			
	▪ Further characterisation of contamination along the eastern boundary of the former marshalling yard where sampling density was low and there is a possibility of undetected hotspots;	The eastern boundary will be capped with either clean fill/soil (noise barriers) or concrete hard stand. Any potential contamination noted during earthworks would be investigated and remediated in accordance with the RAP.		
	▪ A further investigation and delineation of arsenic, zinc and copper hotspots to determine remediation requirements;	Heavy metal contamination hotspots are to be remediated through excavation and off site disposal. Validation of all remediated areas and final exposed soil surfaces would ensure removal of contamination hotspots to concentrations defined in the RAP.		
	▪ Assessment of any offsite migration in areas where TPH has been detected in deep soils near the site boundary; and	TPH contamination is generally limited to the surface layers. TPH contamination beyond 1m would warrant additional investigation to identify potential sources and pathways.		
	▪ Further investigation of areas where off-site works are proposed.	Investigations would be undertaken in off site areas identified during the detailed design phase.		
	▪ Remediation	Details of remediation requirements would be contained in the RAP.		
	▪ Removal and appropriate disposal/treatment of illegally dumped material (solid and liquid);	All flytipped material would be removed from site and disposed of in an appropriately licensed facility prior to construction works commencing.		
	▪ Risk assessment and/or removal of TPH contamination; and	Contamination risks would be assessed during preparation of the RAP.		
	▪ Removal and/or management of asbestos.	Asbestos surveys would be conducted for buildings to		

Issue Category	Comments	Response	Stakeholder ID	Name
		be demolished. Any asbestos present would be removed by a licensed contractor prior to demolition.		
	DEC notes that land farming is proposed for treatment of TPH contaminated soil before it is reused on site. Land farming is not suitable for soil which contains asbestos.	Soils containing asbestos are to be excavated and disposed of off site in a NSW DEC licensed facility. Land farming of asbestos containing materials would not be undertaken.		
	A contingency plan is required for the disposal of this soil if land farming is unsuccessful in remediating TPH contaminated soil. Any contaminated material should be classified in accordance with the Government's Environmental Guidelines: Assessment, Classification and Management of Liquid and Non Liquid Wastes (June 2004).	Validation testing would be conducted on landfarmed materials prior to reuse. In the event that contaminant levels exceed those approved within the RAP after remediation, off site disposal would occur to an appropriately licensed facility, based on classification of the waste according to the Guidelines.		
	Validation - Analytical testing of material from existing stockpiles present on site to determine its suitability for reuse across the site; - Importation of validated clean fill and topsoil for landscaped areas as contamination present in existing fill material may inhibit plant growth; and - Validation of all remediated areas and any final exposed soil surfaces.	The material in the existing stockpiles has been assessed and is considered suitable for reuse on site. All imported materials to carry a validation certificate. Clean topsoil would be used in landscaped areas. Following completion of remediation all exposed surfaces would be subject to validation to ensure contamination levels are below those defined within the RAP.		

Submissions Govt Dept/Agency: DRAINAGE

Issue Category	Comments	Response	Stakeholder ID	Name
drainage	Drainage and flood mitigation-Consent condition requiring SPC to submit detail plans for flood and mitigation works to RailCorp for assessment and endorsement	Plans ensuring appropriate drainage and flood mitigation in accordance with the principles outlined in the EA in Chapter 10, will be forwarded to RailCorp on completion.	582	RailCorp **Submission No 180**

Submissions Govt Dept/Agency: ESD

Issue Category	Comments	Response	Stakeholder ID	Name
ESD	Further, the DEC commends the proposed energy efficient design of buildings on site (p18-5), including maximum use of solar power for signage, navigational aids and pedestrian lighting as well as the use of energy efficient electrical appliances.	ESD initiatives for energy efficient design and solar power to be incorporated during the detailed design phase.	825	DEC **Submission No 309**

Issue Category	Comments	Response	Stakeholder ID	Name
flora and fauna	It is the intention of the recovery planning for GGBFs that frogs from this population, eventually, be able to interact (if only indirectly) with those in the population at Arncliffe (Marsh St wetlands). It is expected that these populations originally were related, given they are both within the Cooks River catchment. Preferably, in the future a series of subpopulations could be established at artificial ponds along the Cooks River. To ensure this is possible, it should be ensured that this development does not create any barriers preventing movement of GGBFs downstream along the Cooks River. Coxs Creek, which will form the northern boundary of the proposed frog breeding and foraging areas, passes under Cosgrove Rd and into the upper reaches of the Cooks River. The proposed management plan for the site (Appendix G, p33) should address the following issues: ▪ Construction of temporary frog-proof fencing to prevent frogs entering construction areas; ▪ Construction of permanent frog-proof fencing to prevent frogs entering operational areas (apart from crossing the existing rail yards to the habitat areas shown in Figure 4, Appendix G); ▪ Clearance of frogs from construction areas prior to construction; ▪ Design and operation/management of the proposed frog breeding pond - habitat features to be present, infrastructure to drain and refill pond, etc; ▪ Vegetation and management of the proposed frog foraging areas; ▪ Protocols to be followed when implementing management actions within the breeding and foraging areas - such as clearance of frogs from areas where harm might occur (eg during grass slashing); ▪ Design and construction of facilities, such as the noise walls and mounds where Coxs Creek exits the site, so as not to preclude the future possibility of Coxs Creek being part of a frog corridor eventually linking Enfield with Arncliffe; and ▪ Details of a monitoring plan for the GGBF habitat area. The consent for the proposal should: • Require the implementation of the management plan; • Identify who will implement the plan; and • Identify and secure the funding source for the plan implementation.	Frog movement corridors were a key consideration when designing the Community and Ecological area. Frog foraging areas and frog ramps within Coxs Creek have been included in the concept design. Fauna fences would be included in the Construction EMP to be prepared by the construction contractor. A review of the appropriate permanent frog barriers would be under undertaken during the detailed design phase. An ecologist would inspect the site to ensure any frogs present are cleared prior to construction commencement. The GGBF management plan will include procedures and schedules for maintenance of frog ponds Vegetation maintenance within frog foraging areas, as with site landscaping, would be undertaken through the GGBF management plan. This would include measures for frog protection during maintenance. Cox's creek culvert will remain untouched by the development. No vehicle access to the creek would be allowed during construction. GGBF monitoring procedures would be contained within the GGBF management plan. The GGBF Management plan will include roles, responsibilities and procedures to ensure protection of any GGBFs present on site.	825	DEC **Submission No 309**

Submissions Govt Dept/Agency: GOVERNMENT POLICY

Issue Category	Comments	Response	Stakeholder ID	Name
Government policy	Is extremely supportive of the development and is cognisant of its role in attaining Government's target of progressing to a 40% modal share of Port Botany containers on rail.	Noted	582	RailCorp **Submission No 180**
Government policy	The MOT supports the development as it: 1) Is consistent with the Government's strategic framework initiatives for the management of containers in the metropolitan area, particularly the Ports growth Plan, the Port Freight Plan and the work of the FIAB 2) Promotes achievement of the Government's target for a 40% rail mode share fro container movements to/from the port by 2011;	Noted	581	Ministry of Transport **Submission No 103**

IssueCategory	Comments	Response	Stakeholder ID	Name
Heritage/Archaeology	The Heritage Office notes that the applicant, in line with the recommendations contained in the AHI, proposes to retain two items of State significance. (Tarpaulin Factory and Pillar Tank) on site. However the details of the potential use of these items are not clear at this stage. The applicant should be asked to provide more information about the conservation and adaptive reuse of these items as part of the proposed development, in particular the Tarpaulin Factory. The items of Local significance- namely the Pedestrian footbridge and Wagon Repair Shed and Yard Master's Office would be offered to a railway heritage organisation. The H O considers that these items of local significance should be ideally retained on site. Their contribution to the significance of the former Marshalling Yards as a whole should be taken into consideration. In this respect the applicant should be asked to explore alternative options to retain and adaptive reuse of these items within the site. The proposed community and ecological area for example may be considered as an alternative location. Removal to another site altogether should be considered as a last resort after considering all other options and if their retention on site is not possible because of the operation requirements of the ILC. If relocation of these items to a 'railway heritage organisation' is the only viable option, the applicant should be asked to explore possible locations and undertake necessary procedural steps with	Reuse options for the Tarpaulin Factory and Pillar water tank will be further investigated as part of the detailed design phase of the project. The Tarpaulin Factory will be stabilised against further deterioration and, in consultation with the Heritage Office and the community, options for its reuse at its present site will be investigated. Only if on-site reuse is found not to be feasible consideration be given to its relocation off-site to a railway heritage museum or demolition. The Pillar water tank will be subject to further consideration for relocating it on-site. The relocation will be undertaken prior to the commencement of Stage 2 construction works. Due to the nature of activities to occur on the site reuse of the Yard Master's office is not possible. The Yard master's office cannot be reused on-site or realistically offered to a railway heritage organisation due to its brick structure. Prior to demolition archive recording of the item will be undertaken, according to Heritage Office guidelines. The footbridge is to be reused on site if possible. Further studies will be undertaken prior to construction to determine the feasibility and location of this. Due to extensive termite damage in the wagon repair shed very few elements are fit for reuse. This will be revaluated and investigations undertaken to determine if some items of this may be able to be reused on site or relocated off-site to a railway organisation. Reuse of part of the footbridge and elements of the wagon repair shed within the community and ecological area would be considered as part of the options studies for reuse. This will be undertaken during detailed design, prior to the construction phase of the project. If during the considerations for reuse, it is established that reuse of heritage items on site is not an option, then the items would be offered to external heritage organisations.	827	Heritage Office **Submission No 141**

	the relevant organisations before approval is given to the proposed development. The former Yard Master's Office has been assessed as having low heritage significance in the AHI because it has lost much of its heritage significance through the modifications to the building and removal of its significant elements. Given that this item has lost most of its original details the HO does not object to the demolition of the former Yard master's Office. However full archival recording of this item or any other heritage item on the site that is to be demolished or relocated should be undertaken in accordance with the NSW HO guidelines. Applicant should be asked to prepare a heritage interpretation plan and strategy for the whole site prior to commencement of works. This should be prepared in consultation with Heritage Office and in accordance with Heritage Office guidelines. The approved interpretation plan shall be imparted at an appropriate location for public appreciation for example at the proposed community and ecological area. The AHI, however, does not assess the impacts of the proposed development on the potential European archaeological relics on the site. It is understood that the proposed project will be an 'approved project' for the purposes of Part 3A of the EP&A Act and 75U of the Act therefore suspends the requirement for an excavation permit under section 139 of the Heritage Act. The applicant, however, should be asked to investigate the impact of the proposed development on the potential archaeological significance of the site. The assessment should be accompanied by an archaeological research design and appropriate mitigation techniques, and should be ideally undertaken prior to the issue of the consent as the findings of this assessment may result in some recommendations to the proposed design. It is requested that upon the result of these studies appropriate conditions regarding the prevention of the potential archaeological remains and their appropriate management should be included within the conditions of consent should approval be granted.	Full archival recording of the Yard Master's office would be undertaken prior to demolition. A heritage interpretation plan and strategy for the entire site will be undertaken by SPC prior to construction works commencing on site An archaeological assessment for indigenous and non-indigenous heritage was undertaken by Navin Officer in 2001. The report was referenced in the study by Graham Brooks and Associates (Appendix H to the EA). The indigenous studies in the Navin Officer report were updated for this project, but no changes were warranted for the non-indigenous aspects of the report. This report will be provided to the Department of Planning and the Heritage Office. The Navin Officer (2001) report concluded that," given the picture of massive disturbance across the site, it is unlikely that significant archaeological deposits remain on the site. The only possibility is that some deposit may have been sealed under extant buildings or slab foundations. Even so, it is unlikely that such deposits have the potential to tell us more about this site or the construction of what are relatively well documented buildings". Limited archaeological testing for European archaeology is recommended for the area of the Wagon Repair Shed and the Yard Master's Office. This will be undertaken.		

Submissions Govt Dept/Agency: HYDROLOGY

Issue Category	Comments	Response	Stakeholder ID	Name
Hydrology	The DEC commends the reuse of rainwater on site (p10-18) for truck wash bays, toilet flushing and top up of the frog pond.	Noted	825	DEC **Submission No 309**

Issue Category	Comments	Response	Stakeholder ID	Name
management	We suggest the additional actions to those identified in the environmental management plan (Table 21-1) to mitigate construction noise impacts: **Noise and Vibration** Minimise construction noise impact on surrounding residences. Time restriction for construction activities - which allow construction work from 7am to 6pm on Saturday (if approved) ONLY if this work is inaudible at residential premises as outlined in Appendix E, Section 6.4. A more extensive community consultation and liaison plan which include community involvement in the plan, community access to compliance monitoring data, regular' reporting of complaints, and the actions undertaken to resolve these complaints. Utilising "best practice" technology should specify a commitment to the utilisation of alternative quieter construction technologies (not just technology on existing equipment) and specifically identify these technologies. This is especially important for the most significant noise generators for each stage as identified in Appendix E pp.47 - 48 The use of alternative quieter technologies (such as electric powered machinery). The implementation of best work practices and site design to minimise intermittent noise generation from unloading and loading containers. A comprehensive community consultation and liaison plan that includes community involvement, initial monitoring to determine actual impact, a response strategy should noise impacts be unacceptable, and a responsive noise complaints mechanism, with regular reporting of complaints and the actions undertaken to resolve these complaints to the Department of Planning and the community. Minimise dust generation during construction Dust Management Plan should include continuous downwind boundary monitoring of PM10, with feedback mechanism to site manager when pre-determined levels for modifying and ceasing works are reached. Timely mechanism linking community complaints line to site manager so that works can be modified or ceased when high off-site dust levels are reported. The M5 LAQMP has not been justified, and more recent,	This would be dealt with in the Construction EMP SPC will seek to maintain the construction times as specified in the EA. However, an undertaking will be provided, and written into the Noise Management Plan, that high noise operations will not be undertaken after 1pm on Saturdays. Consultation Plans would be prepared and implemented prior to construction and operation commencement. Communication methods will be developed at that stage. Actions are considered reasonable. Noise management measures as outlined in Chapter 11 of the EA would be incorporated into the Construction Noise Management Plan developed for the site. The Operational Environmental Noise Management Plan would include procedures for monitoring noise and responsive noise complaints mechanisms. Noise management measures and consultation and liaison will be incorporated into the Operation Noise Management Plan developed for the site. This is proposed.	833	NSW Health **Submission No 318**

	validated emission factors should have been used. The approach to modelling the on-site contribution to operational phase impacts is appropriate, however we note that the assessment has assumed the use of low emission (US Tier 3 & LPG) plant. We note that there is no commitment in the management plan to use this plant. The use of emission data for cars and trucks from the M5 LAQMP has not been justified, and more recent, validated emission factors should have been used. Operational Environmental Management Plan The environmental management plan (Table 21-2) should be expanded to further mitigate operational phase air quality impacts. We suggest additional actions: ▪ Minimise emissions from plant and equipment ▪ All on-site plant to be low (US Tier 3 or better) or zero ▪ emission (such as electric powered machinery)(also provides noise reduction benefits). ▪ On-site staff transport to be electric, hybrid or other low emission vehicles OR the requirement for the projected 300 on-site car trips per hour be substantially reduced by better site design and work-practices. ▪ Trucks accessing the site to be Euro 3 or better, on approved maintenance schedule. ▪ Requirement for minimal truck idling times on-site. ▪ Liaise with rail freight operator to utilise cleaner fuel improved maintenance to reduce emissions. Remediate contaminated soils A comprehensive remediation plan needs to be developed, including better characterisation of existing contaminant levels and strategies to minimise migration of contaminants from the site. The plan should include particular consideration of the potential for dispersion of contaminants during excavation, and an assessment of any additional health risk to surrounding residents above that of inert dust exposure. If land farming to volatise hydrocarbons from contaminated soil is undertaken then a health risk assessment for the surrounding community should again be undertaken.	The vehicle emission factors used for the off-site air quality impact assessment were sourced from the M5 East Air Quality Management Plant (M5 East AQMP). The M5 East AQMP states that the emission factors were supplied by the EPA with the following references: Xu, C (2001a) 2002 Emission Factors. NSW Environment Protection Authority, personel communications. The three reports from which these factors have been derived are in the process of formal peer review and are: *Xu, C (2001) Revision of Emission Factors for Existing Late Model Petrol Cars. MVEPS Improvement Program Technical Report 1; Xu, C (2001) Revision of Emission Factors for Future Model Petrol Cars with Scenario Projections. MVEPS Improvement program Technical Report 2. Xu, C (2001) Development of Diesel Vehicle Emission Factors. MVEPS Improvement Program Technical Report 4.* With respect to the on-site equipment US EPA provided the only available set of "robust" emission factors for the type of equipment proposed, and Tier 3 best co-incided with the likely year when this equipment would be required at Enfield. It should be noted in terms of NO_2 the predicted operational phase impacts (on-site equipment / trucks / trains) are well below DEC 1-hour and annual criteria, at most 77 % of the 1-hour criteria, for the worst-case including background levels. In the case of PM_{10} where impacts are only marginally less than the 24-hour criteria it should be noted that there is no difference in particulate emission factors for Tier 0, 1, 2 and 3 equipment, for the relevant engine sizes considered in the assessment. A Remediation Action Plan would be prepared by a suitably qualified contaminated land consultant in accordance with Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites, DEC 1997 prior to the commencement of earthworks. This would include specific measures to remediate contamination hotspots identified, cleanup criteria to be achieved and procedures for the identification and management of potential contamination unearthed during remediation and earthworks. Hydrocarbons would be bioremediated rather than volatilised. No risk study would be required.		

management	For the construction phase of the project, the DEC's principal concerns are noise impacts, sediment and erosion control, dust control, waste management, contaminated land and chemical storage. Generally, the DEC considers that the environmental impacts associated with construction are manageable to acceptable levels provided all project impacts are fully characterised during the sub-plan process and appropriate controls and mitigation measures undertaken.	A series of environmental management plans are to be prepared for the construction and operation phases to ensure identified impacts are minimised and managed.	825	DEC **Submission No 309**
	Environment Protection Licence The DEC notes on page 2-8 of the EA that the ILC may be used to store in excess of 2,000 tonnes of chemical substances. An Environment Protection Licence will be required if activities at the ILC result in all or part of the facility meeting the criteria for a 'Chemical Storage Facility', as defined in Schedule 1 of the Protection of the Environment Operations Act 1997 (POEO Act). The DEC stresses that any such licence could cover a range of environmental media as required and, for example, may include noise limits.	SPC will not be seeking a licence at this stage. An EPL may be sought by the site operators if quantities of chemicals to be handled or stored exceeded the threshold limits.		
	Environment Performance Monitoring The DEC'S experience with similar infrastructure projects suggests environmental performance would be significantly enhanced by an independent performance monitoring and reporting process. To be most effective, the monitoring and reporting should inform and be integrated with the project's management decision making process.	Noted. Comprehensive environmental management plans to be prepared for the construction and operation phases would be based on current best practice methods.		
	The DEC is the Appropriate Regulatory Authority for the construction phase of the project under section 6 of the POEO Act. In this regard, the DEC expects that the proponent ensures optimal environmental performance on the site at all times, including the implementation of appropriate controls that are maintained on a regular basis.	The CEMP would include measures for monitoring and reporting on environmental performance. Continual improvement would be a key environmental objective.		
	Chapter 21, page 21-1 of the EA states that the environmental management commitments proposed include the preparation of a Construction Environment Management Plan (CEMP). The CEMP should contain an environmental monitoring and reporting program and it is important that this program facilitates ongoing improvements in the on-the-ground performance of the project.			
	The selected contractors for the project should receive an appropriate environmental induction before working on the site. Environmental training of site personnel should include regular 'toolbox' meetings to discuss mitigation measures to resolve complaints and other environmental impact issues.	The CEMP would include requirements for environmental inductions and awareness training for contractors prior to commencement on site.		
	Water management Under section 9.4.1 titled 'Soil Erosion' (p9-13) the DEC			

	notes that during the construction phase, a Stormwater Water Management Plan will be prepared in accordance with the Department of Housing's Managing Urban Stormwater - Soils and Construction, 4th Ed, 2004 (the Blue Book). The DEC emphasises that once adequate sediment and erosion controls are established on site, they should be maintained on a regular basis and updated as required in response to changing site conditions. Further, the DEC advises that all temporary construction exits should be primarily fitted with appropriate vehicle shakedown and washing facilities to contain sediment and mud on site. These facilities may be complemented with secondary and/or tertiary controls if needed. **Chemical storage** Chemical Storage of fuels, oils or chemicals are to be stored on site, then appropriately bunded and covered storage facilities with impervious floors should be provided to prevent leaching or spillage of these materials into the surrounding environment. The DEC's document Bunding and Spill Management provides guidelines for the development of bunds. Where applicable, the construction of bunds should comply with the requirements of: • Australian Standard AS 1940 2004: The Storage and Handling of Flammable and Combustible Liquids; • Australian Standard AS4452 1987: The Storage and Handling of Toxic Substances; and • The Dangerous Goods Act 1975.	These management measures would be addressed through the Soil and Water management Plan. To be addressed in the CEMP and OEMP.		

Issue Category	Comments	Response	Stakeholder ID	Name
Noise	**Construction Noise** The construction noise levels provided in the EA indicates that there is the potential for an increased risk of health effects from noise exposure for all residences at various stages of construction. NSW Health indicated in its Director General requirements that noise impacts upon sensitive receptors should be specifically considered. This does not appear to have been addressed and consequently the predicted impact of construction noise upon St. Anne's School, Strathfield South High School and other sensitive receptors cannot be- ascertained. It is likely, as with many major construction projects in an urban area, that exceedance of the noise goals will occur after feasible and reasonable noise mitigation measures have been used. Section 4.12.5 lists the proposed construction times as 7am to 6pm Monday to Saturday. However, the DEC advises that normal construction times should be 7am to 6pm Monday to Friday and 8am to 1pm Saturdays and no work on Sundays and Public Holidays. Works should not be conducted outside these hours unless there is specific justification for doing so. In addition a, a community consultation program and a 24 hour complaints handling system should be implemented prior to any out of hours works. **Operational Noise** Table 11-7 (Chapter 11) of the Environmental Assessment highlights the predicted exceedances of operational noise criteria when compared to the NSW EPA Industrial Noise policy guideline values. It is noted that predicted noise levels for two of the six residential sites considered exceed criteria levels during calm and isothermal weather conditions even after mitigation measures are used. Exceedances are greater under adverse weather conditions with these adverse wind conditions expected to occur approximately one third of the year. The exceedances have been predicted to be as much as 15dB above criteria. It is of further concern that noise impacts up to 7dB above criteria are predicted at St Anne's school. It is noted that the predicted values are based on the assumption that all noise sources operate concurrently ("worse-case" assessment). However, the noise consultants report noted that there is little to no reduction in noise impact between a "worse-case" scenario and "normal-case" scenario. Intermittent /instantaneous noise generation was assessed through the NSW Environmental Noise Control Manual in the form of a sleep arousal criterion. Exceedances of these	Noted Construction noise was assessed in the report to the nearest affected residential receivers, as these were closer to the site than other sensitive receivers, including St. Anne's School and Strathfield South High School. Further to this the Strathfield South High School is shielded from the site by the industrial area to the north of the site and the existing noise wall along the southern boundary of the school. There are no DEC criteria that distinguish appropriate levels for residential receivers versus non-residential receivers and impacts at non-residential locations would be similar to or less than those identified for residential locations. Therefore the assessment that has been undertaken for the construction phase noise is considered appropriate. SPC will seek to maintain the construction times as specified in the EA. However, an undertaking will be provided, and written into the Noise Management Plan, that high noise operations will not be undertaken after 1pm on Saturdays. Mitigation measures were extensively reviewed as part of the EA. It is considered that at this stage of the project, when the design is still fairly flexible, all reasonable and feasible mitigation measures have been considered to reduce overall noise emissions from the site. Additional mitigation will need to be considered at the design phase to reduce noise levels to achieve compliance with the Project Specific Noise Levels (PSNLs). Any further measures considered would include source specific measures, such as limiting plant noise levels and use of local shielding (eg container stacks, sheds, buildings) in specific locations. These more specific design matters are difficult to determine at this stage of the project.	833	NSW Health **Submission No 318**

Issue Category	Comments	Response	Stakeholder ID	Name
	criteria are predicted in all weather conditions, some by as much as 15dB (giving a 30dB increase from background). As this development intends to be an ongoing 24hour/7day a week operation it is important that community noise impacts strictly comply with noise criteria and it would be desirable to reduce this level below this criteria where practical. Intermittent /instantaneous noise generation should be kept to a minimum to reduce any potential adverse effect on health through both sleep disturbance and annoyance. **Road Noise** Current road noise levels are already between 7 to 21dB above the criteria set in DEC Environmental Criteria for Road Traffic Noise. The predicted additional noise generated from this proposed development falls within the 2dB increase allowed under the DEC Environmental Criteria for Road Traffic Noise. Despite this compliance additional mitigative options should be pursued in view of the pre existing noise impacts experienced by affected residents. **Rail Noise** This has not been directly assessed in this application and relied on Port Botany Expansion EIS assessment. Due to the small number of predicted train movement it is estimated that an increase in noise levels from this source should be up to 1dB. This increase should be further reconsidered in the context of cumulative noise impacts. **Cumulative Noise Impacts** it is important that cumulative predicated impact of road and rail be added to the predicted operational impacts to determine a more accurate prediction of noise impacts. We note that cumulative impacts of road and operational noise may be significant to the northwest of the proposal (residences located between Norfolk Road, Hume Highway, Roberts Road and Waterloo Road). Cumulative rail and operational noise impacts may be significant to the southeast of the proposal (residences located in the vicinity of Bazentin Road, Belfield)	The project is not responsible for existing road traffic noise levels. The contribution to traffic noise from this project is calculated to be in the order of 0 – 0.2dB(A) at residential receiver locations – refer to the RT&A Technical Memo (Appendix E). Such a small traffic noise increase is considered minor, insignificant and inconsequential. Furthermore, the NIA found that mitigation of existing noise, through the provision of noise barriers for residences is not possible as driveway access to roads is required. Therefore it would not reasonable and feasible to reduce traffic noise levels. The appropriate approach to the management of effects from the rail freight line corridor is one that includes all relevant Government agencies, including DEC, RailCorp and ARTC. SPC will work with these other agencies and relevant Councils to consider ways of managing impacts associated with rail operations in the dedicated freight rail corridor. Cumulative noise impacts have been considered to the extent that NSW noise policy allows, through the application of the amenity criteria. It is noted that in NSW road, rail and industrial noise are assessed to their own separate criteria, as different types of noise are perceived differently in the community. There are currently no overall criteria that address total environmental noise.		
Noise	For operation of the project, the DEC's principal concerns are noise impacts and air quality issues The DEC notes that the Noise Impact Assessment presents only the result of an assessment of potential noise enhancing weather effects. The meteorological data used and the weather station location has not been presented in the NIA.	Noted The NIA presents predictions under both calm-isothermal (acoustically neutral) conditions and adverse weather (noise-enhancing wind) conditions. The weather stations from which the meteorological data was acquired are Bankstown Airport AWS and the	825	DEC **Submission No 309**

Issue Category	Comments	Response	Stakeholder ID	Name
		Lidcombe AWS. Information regarding wind was based on available AWS wind rose data – see the RT&A Technical Memo's Annexure 1 (in Appendix E). According to the NSW INP, prevailing winds above 3m/s (11km/h) are not considered in noise assessments as they do not increase noise impacts. Furthermore, noise measurements should not be undertaken when wind speed exceeds 5m/s (18km/h).		
	The DEC notes that the noise modelling considered two broad operating scenarios. The difference between the two scenarios is that Scenario 1 included both shunting locomotives (2x48class) and locomotives involved in moving a train set on to the site (3x81 class), while scenario 2 only considered the shunting locomotives. It should be noted that it is DEC's experience that older and noisier locomotives also operate on the Botany Goods Line.	SPC advised that, based on current information, 48-class locos will typically be used as 'shuttle trains' and 81-class locos will be used for rural bound trains. The issues of older and noisier locomotives are a result of new entrants to compete in a deregulated freight rail market. As the percentage of container movements by rail increases, the improved economic certainty will increase the commercial viability for further investment in more efficient rolling stock.		
	The NIA does not indicate the number of residences potentially affected by noise levels that exceed the Project Specific Noise Levels (PSNL) under noise enhancing weather conditions. The DEC notes that Table 4.12 in the NIA indicates that under calm isothermal conditions that 140 houses are predicted to experience noise levels slightly above the PSNL. The number of houses with significant exceedances above the PSNL during noise enhancing weather conditions is likely to be significantly more.	It is noted that the number of houses affected shown in Table 4.12 of the NIA is high as the noise model was conservative in not taking into account local shielding provided by residential and other non-industrial buildings off site. Such building data was unavailable for inclusion in the noise model at this stage. It is intended that building data be included in the detailed noise model to be run at the Detailed Design / EMP phase, which is expected to show a significant reduction in the number of houses affected. Therefore, an analysis of the number of affected houses would be more accurately conducted at the DD / EMP phase and after all additional reasonable and feasible noise mitigation options, as set out in the RT&A Technical Memo (in Appendix E), have been incorporated into the noise model		
	It is clear from the NIA that widespread and significant exceedances of the PSNL are predicted. (In this case the PSNL are determined from the amenity criteria). Importantly, predicted noise levels are normally used to establish appropriate noise limits for an operation (where applicable). In cases where it is not possible to achieve the PSNL even after applying all feasible and reasonable mitigation measures, predicted noise levels may be used to set noise limits that are up to 5 dB above the PSNL following negotiation with the regulator and/or consent authority. In contrast, negotiated agreements would normally be required where predicted levels are still more	Exceedance of the noise criteria was predicted after the application of mitigation measures, but only during adverse wind conditions and mostly in terms of the 'amenity' criteria. The modelling conservatively assumes that the site is operating at capacity and all plant is operating at full load over the entire night-time 9 hour assessment period. As this is unlikely to occur, then the typical operational scenarios have now been modelled. The results of these assessments are presented in the RT&A Technical Memo in Appendix E. In summary compliance is achieved with both the		

Issue Category	Comments	Response	Stakeholder ID	Name
	than 5 dB above the PSNL after the application of all feasible and reasonable mitigation measures. In view of the likely number of noise-sensitive receivers affected by exceedances of the PSNL and the magnitude of these exceedances, it is recommended that: - Further mitigation measures are investigated with a view to reducing the extent and magnitude of exceedances of the PSNL to within an acceptable range, including through the use of best-practice rolling stock on the ILC site; and - Additional consideration is give to the extent to which negotiated agreements may be feasible and reasonable mitigation measure, for example land use mapping with overlayed noise contour plots. The DEC advises that the exceedances of the sleep disturbance screening criteria are significant. Current DEC guidelines recommended that where the screening criteria is exceeded that a more detailed analysis is required. The detailed analysis should cover the maximum noise level or $L_{A1, (1minute)}$, the extent that the maximum noise level exceeds the background level and the number of times this happens in the night period. Some guidance on possible impact is contained in the review of research results in the appendices to the Governments Environmental Criteria for Road Traffic Noise (ECRTN). Other factors that may be important in assessing the extent of impacts on sleep include: • how often high noise events will occur; • time of day (sleep disturbance is normally taken to occur between 10pm and 7am); • whether there are times of day when there is a clear change in the noise environment (such as during early morning shoulder periods). The NIA concludes that "under calm and isothermal conditions the levels remain below 65dB(A), which is considered to be the level that could cause arousal based on more recent research...". The reference to 65dB(A) comes from the Environmental Criteria for Road Traffic Noise (ECRTN) Appendix B which presents the results of limited studies regarding awakening reactions. The research suggests that maximum internal levels not exceeding 50-55dB(A) are unlikely to cause awakening reactions. It is generally postulated that a 10dB transmission loss occurs between a typical residential facade with windows open to allow minimum Building Code	'Intrusiveness' and the 'Amenity' PSNLs under calm and worst-case noise-enhancing wind scenarios, at all receivers with the exception of a few minor exceedances during adverse wind conditions of 1-2dB(A) and one 4dB(A) exceedance under adverse wind from one specific direction. These results do not include additional noise mitigation measures, such as those discussed in the RT&A Technical Memo, therefore, there is scope to further reduce noise emission levels from the operation of the site as part of the DD / EMP phase, when more specific details about the site and its operations are known, in order to comply with the PSNLs. After all additional reasonable and feasible measures are incorporated into the design at the DD/EMP phase (as set out in the RT&A Technical Memo in Appendix E), it is expected that the PSNLs will be achieved. The DEC's sleep arousal criterion is currently being reviewed, as the general opinion is that this criterion is conservatively low. For the NIA, guidance was taken from the EPA's ENCM, which provides a conservative criterion, and the ECRTN, which sets a suitable criterion which will ensure that 90% of the population (including the aged) are protected in their sleep, based on recent research. However, it is understood that the current DEC thinking is that an initial screening test should be carried out to determine whether instantaneous noise sources at night comply with the criteria established in the ECRTN. If noise levels are found to exceed, more detailed analysis is required to determine the extent of potential disturbance to sleep, based on the number of events, timing of events etc. It is unlikely that this level of detail can be provided at this early stage of the project. This matter would be better addressed at the design stage as part of the EMP, when details of site operations are known. Notwithstanding this, a more detailed analysis of sleep disturbance issues is carried out and included in the RT&A Technical Memo (Appendix E), based on several assumptions.		

Issue Category	Comments	Response	Stakeholder ID	Name
	of Australia ventilation requirements, hence the reference to an external level of 65dB(A). Whilst the material in Appendix B to the ECRTN may be used as part of an assessment of sleep disturbance impacts, it should not be relied upon as being capable of informing an objective criteria. Other factors such as the number of times the maximum noise levels events are likely to occur during the night time period and the nature and character of the noise needs to be considered. **Road Noise Assessment** Table 5.4 in the NIA indicates that predicted 2016 LAeq,15hr and LAeq,9hr noise levels, including ILC traffic, will not result in a greater than 2dB increase in existing traffic noise levels. It appears that the predicted 2016 LAeq,period levels have also taken into account natural traffic growth (growth the would occur regardless of the ILC), and hence the predicted levels are conservative. It would however be beneficial for the traffic noise increase associated solely with ILC traffic be reported. However, it should be noted that the traffic noise levels being experienced on Liverpool Road and Roberts Road significantly exceed the Roads and Traffic Authority's (RTA's) definition of acute traffic noise exposure (ie acute traffic noise levels are levels exceeding L.Aeq,i5hr 65dB(A) and LAeq,ghr 60dB(A)). This should be considered in the context that one of the objectives of the ILC is to reduce acute traffic noise impacts in the area around Port Botany. The number of residences experiencing acute noise levels has not been identified. This is not a criticism of the NIA, as that level of assessment is not normally undertaken. However, given the government objective of reducing road traffic noise increases on roads surrounding Port Botany, it would seem logical to consider the extent of traffic noise impact in the vicinity of the proposed ILC in terms of exposure to acute noise levels. **Rail Noise Assessment** The DEC'S position on the rail noise assessment for the Botany Goods Line is that no holistic and well informed analysis of the potential noise impacts arising from the Governments Policy of increasing rail modal share of port related traffic has been undertaken. More importantly, the responsibility and commitment to an assessment, and where necessary noise mitigation, is not clear. Further, the DEC directs the Department of Planning (DoP) to the Land & Environment Court proceedings for Robert Duncan Bell v Minister for Urban Affairs & Planning (No. 10046 of 1997) so as DoP can determine, in a planning sense, whether the assessment of rail noise impacts satisfies planning	The assessment carried out in the NIA, compares 2016 traffic noise levels (with ILC) to 2006 future-existing noise levels (without ILC). This type of assessment is considered to be more conservative than a direct comparison in 2016. Nonetheless, an assessment which compares traffic volumes for with and without ILC (ie natural growth only) is attached in the RT&A Technical Memo (in Appendix E). It is agreed that this is not usually required as part of this sort of assessment, but it could be considered during the DD/EMP phase. That is, the number of residences exposed to acute noise levels (with/without ILC) will be identified more accurately during the DD/EMP phase. The EA outlined that, if the NSW Government policy that 40% of containers to and from Port Botany are to be carried by rail by 2011, the number of freight trains using the dedicated line from Port Botany would increase significantly beyond current levels, regardless of whether the ILC at Enfield is developed or not. The proposed ILC would not be generating more freight trains along the line. Rather, it would provide a loading / unloading point for some freight trains that are expected on and must use that line. The management and regulation of noise and vibration issues on the freight line is a matter for RailCorp (the current Environment Protection Licence (EPL) holder), the likely future EPL		

Issue Category	Comments	Response	Stakeholder ID	Name
	requirements. The DEC also emphasises that the NIA has not explored the extent to which the use of best- practice rolling stock could be used to reduce the rail-related impacts both at the ILC and along the rail corridor between the ILC and Port Botany. It is the DEC's experience that valuable reductions in noise can be achieved through the use of modern rolling stock. It is noteworthy that the NIA assumes a class of locomotives for shunting that have typically been in service for 35 to 40 years and a class of mainline locomotives that have typically been in service for 20 to 25 years. Options for best-practice rolling stock that could be considered for the ILC include: • modern locomotives that achieve the current locomotive noise criteria; • multi-pack container wagons, to reduce the extent of noise generated by stretching and bunching of the train; • ECP braking technology to allow for smoother braking; and • the use of hybrid locomotives for shunting. The DEC considers it would be appropriate to further assess the feasibility and reasonableness of using best-practice rolling stock to deliver improved noise outcomes, particularly given the extent of exceedances of PSNL and the current high levels of rail noise along the Botany to ILC rail corridor. The statement of commitments for noise performance does not include a commitment to achieve acceptable noise levels at sensitive receiver locations, which, in this context means achieving noise levels that substantially comply with the Governments Industrial Noise Policy (INP). The NIA has indicated that, under noise enhancing weather conditions, that have been determined to be a significant feature of the area, the proposal will generate noise levels that significantly exceed the INP PSNL. The predicted levels significantly exceed the levels that DEC would normally license to. On this basis the statement of commitments are not considered capable of delivering acceptable noise outcomes. The DEC'S experience with similar infrastructure projects suggests environmental performance would be significantly enhanced by an independent performance monitoring and reporting process. To be most effective, the monitoring and reporting should inform and be integrated with the project's management decision making process.	holder (ARTC) and the regulator of the licence (Department of Environment and Conservation (DEC)). The operation of the rail transport of freight to and from Enfield falls within the existing operating licences for the freight line, and no further assessment is required. However, it is noted in the DEC's comment on the rail noise assessment for the Botany Goods Line that no holistic and well informed analysis of the potential noise impacts arising from the NSW Governments aim of increasing the rail modal share of port related traffic has been undertaken. As a consequence the responsibility and commitment to an assessment, and the necessity for the application of feasible noise mitigation measures, is not clear. Sydney Ports acknowledges DEC's concern, and in response to this Sydney Ports is prepared to participate in any interagency working group established to address rail noise impacts along the dedicated freight line. It should be noted that Sydney Ports, as a condition of consent for the Port Botany Expansion project, has established a Rail Noise Working Group to address previously identified rail noise issues along the Freight Line between Enfield and Botany Yard. This group includes Sydney Ports, RailCorp, DoP, ARTC and relevant councils and community members. Consultation with relevant regulatory authorities including DEC would also be undertaken. Mitigation options were extensively reviewed as part of the EA. It is considered that at this stage of the project, when the design is still fairly flexible, all reasonable and feasible mitigation measures have been considered to reduce overall noise emissions from the site. Additional mitigation will need to be considered at the design phase to reduce noise levels to achieve compliance with the PSNLs. After all additional reasonable and feasible measures are incorporated into the design at the DD/EMP phase (as set out in the RT&A Technical Memo in Appendix E), it is expected that the PSNLs will be achieved. This will be incorporated into the project's environmental management planning.		

Submissions Govt Dept/ Agency : NOISE

Issue Category	Comments	Response	Stakeholder ID	Name
Noise	Noise and vibration- Reference to the proposed duplication project between mascot and Botany yard. RailCorp advises that this project is on hold, and that it has not proposed a preferred method of noise mitigation without undertaking extensive stakeholder consultation	Noted	582	RailCorp **Submission No 180**

Submissions Govt Dept/Agency:POLLUTION

Issue Category	Comments	Response	Stakeholder ID	Name
pollution	The landscape and urban design assessment contained with the EIS (Appendix I) included an assessment of predicted light spillage, and concludes that the light spill into neighbouring areas will be virtually undetectable, with levels at the nearest residences of 0.0 to 0.02 lux. The final design plan of the proposed development should follow closely the lighting concept described in this assessment to ensure excessive light spillage onto the local residential area does not occur.	Lighting would be addressed during the detailed design phase and the potential for light spill considered when siting lights and providing illumination specifications.	833	NSW Health **DoP Submission No 318**

Issue Category	Comments	Response	Stakeholder ID	Name
Rail Issues	**Cumulative impacts** Report does not address cumulative impacts associated with increased usage of RailCorp network at a regional level, with particular emphasis on freight distribution and noise. Acknowledges this may be outside scope of consent but believes there should be an interagency working party to address the consequential impacts on regional rail corridors associated with projects that contribute to the NSW Government's Port Growth Plan.	SPC is willing to be a part of any relevant interagency working party.	582	RailCorp **DoP Submission No 180**
	Support for all inbound and outbound traffic between the project site and Port Botany to be on rail and to operate on a 24 hour a day 7 day basis	Noted		

Submissions Govt Dept/Agency: SAFETY

Issue Category	Comments	Response	Stakeholder ID	Name
Safety	The preliminary hazard analysis contained within the EIS (Appendix K) demonstrates that there are very low risks of accidents involving the transport of hazardous goods either by road or by rail. The traffic management plan should ensure the transport of any hazardous goods occurs on roads away from residential areas where possible. A Local Area Management Plan should be developed in consultation with the local community and school representatives to ensure that any additional traffic that results from the proposed development dose not cause an increase in the number of accidents in the local area.	To be addressed in the Local Area Traffic Management Plan To be addressed as part of the Local Area Traffic Management Plan	833	NSW Health **DoP Submission No 318**

Submissions Govt Dept/Agency: SITE QUALITIES

Issue Category	Comments	Response	Stakeholder ID	Name
Site qualities	Site is already linked to the port by a dedicated freight line.	Noted	581	Ministry of Transport **DoP Submission No 103**

Issue Category	Comments	Response	Stakeholder ID	Name
Socio Economic	Health impacts of increased noise levels may include sleep disturbance, annoyance, and speech and communication interference and may in the longer term contribute to cardiovascular disease and mental health problems. These effects on the surrounding community, including sensitive receptors such as homes, schools and hospitals, need to be considered when assessing any development application with the potential to increase noise levels. To enable a full assessment of potential health impacts from construction noise it would be useful to reassess the predicted impacts at receptors by re-estimating with: ▪ Suggested mitigation strategies ▪ Noise impacts from buildings constructed onsite (should stage 4 and stage 5 operate concurrently) It appears, from the traffic impact assessment, that access to recreational and retail facilities and schools would not be affected, however this has not been specifically addressed in the EIS. Neither has there been identification of groups particularly sensitive to increased traffic volumes (such as children and the elderly) or the consideration of these groups in terms of predicted effects on pedestrian safety as a result of the proposed development.	Construction and Operational noise issues would be addressed through the implementation of the noise and vibration management plan. The construction noise assessment identified impacts at stage when many assumptions were made about the construction EMP. More detailed assessment would be carried out as part of any Construction Noise MP. This would take into consideration predicted noise levels with mitigation measures. Access to these facilities was not considered in detail as traffic volumes attributable to the proposed ILC at these locations was negligible. However, these issues would be considered during preparation of the Local Area Traffic Management Plan to ensure that traffic is not significantly increased at these locations.	833	NSW Health **DoP Submission No 318**

Submissions Govt Dept/Agency: SUPPORT PROPOSAL

Issue Category	Comments	Response	Stakeholder ID	Name
Support Proposal	Railcorp is extremely supportive of this development	Noted	582	RailCorp **DoP Submission No 180**
Support Proposal	The MOT supports the development	Noted	581	Ministry of Transport **DoP Submission No 103**

Issue Category	Comments	Response	Stakeholder ID	Name
Traffic	The construction traffic impact assessment concluded that the proposed development will have a minimal impact during the construction phase. There will, however, be an increase in construction traffic of between 29 and 75 vehicles per day, and an estimated 150-170 staff vehicles per day to and from the site. The potential for road accidents is therefore present, and a comprehensive traffic management plan ought to be developed to ensure that road safety is optimised, as well as ensuring construction and other associated traffic does not use local residential streets. A Local Area Management Plan should be developed in consultation with the local community and school representatives to ensure that any additional traffic that results from the proposed development does not cause an increase in the number of accidents in the local area.	A detailed Construction Traffic Management Plan will be undertaken by the construction contractor following approval to proceed. The traffic generated from the ILC will use designated arterial road network and will not access the local street network. There is a potential for road accidents to occur as a result of the ILC. However, the traffic from the ILC contributes to less than1% of the overall traffic on the road network and therefore overall improvements regarding road safety should be considered with the RTA and the Councils.	833	NSW Health **DoP Submission No 318**
	The EIS notes that public transport access to the site of the proposed development is poor. Consequently, there are potential benefits to be gained from exploring options such as the proponent providing regular transport to and from Strathfield, Lakemba or Belmore train stations, to encourage staff to use public transport.	Transport could be provided from local train stations to the ILC. However – the majority of workers will be shift workers. Shift 1 is 5am to 4pm and Shift 2 is 4pm to 3am. It is considered unlikely that employees would utilise the rail network as there are few trains which would potentially get employees to the origin train stations in time to get to work. This situation can be monitored and a plan could be prepared following a staff survey of trip origin.		
	Minimise impact of ILC operational traffic on surrounding network.	This has been considered as part of the EA. The traffic from the ILC contributes to 1% of the overall traffic on the road network		
	Development of public transport strategy for staff to improve access to the site Development of a Local Area Management Plan in consultation with the local community and school representatives with the objective of ensuring local road safety.	See above.		
Traffic	ILC traffic and transport will necessarily impact on bus servicing. Time taken for heavy vehicles to move off from a standing start will impact on delay experienced at signals, while the length of some trucks and the volume of additional vehicles will impact on the ability of buses to move quickly from bus stops into the traffic stream.	The INTANAL intersection modelling allows for the different characteristics of heavy vehicles and the effect that these have on traffic flow.	818	Ministry of Transport **DoP Submission No 142**
	While additional seconds of delay may not be considered significant for ordinary traffic, this is not the case for buses, which must be able to run reliable, fast services to maintain and increase patronage and hence maximise the return on investment to government.	The reported delay is the average for all vehicles that pass through an intersection in a 1-hour period. Only very large changes in delay would be noticed by most individual vehicles.		

Issue Category	Comments	Response	Stakeholder ID	Name
	During construction 'the main routes used for the movement of key materials from the site would be via the Hume Highway or via Roberts Rd' At peak activity, these movements amount to more than 7 trucks an hour and with staff traffic of 240 vehicles in the peak hour. Figure 7-5a shows the 2016, AM estimates. The biggest impact is on Roberts Rd, where it appears that 82 ILC heavy vehicles (HV) will access Wentworth St from Roberts Road in the AM peak hour. 43 ILC HGVs will use the Hume Highway/Centenary Drive intersection. **Summary:** The Roberts Rd/Juno Pde and Roberts Rd/Centenary Drive/Hume Highway intersections will require work to ensure bus priority. While the ILC does not appear to show a great impact on the Hume Hwy or on the Hume Hwy/Coronation Pde intersection, this would need to be monitored. Heavy vehicles on Roberts Rd is a significant issue for bus servicing.	The movement of all 240 construction staff is a peak required for a period of approximately two months and is a worst-case scenario. There will be a spread of arrivals and departures and not all are anticipated to arrive in the peak hour. The 43 ILC heavy vehicles would pass over the top of the intersection, rather than contribute to delays at the signals. There would be 19 ILC heavy vehicles moving between Roberts Road and Hume Highway west of Roberts Road. These works will be required without the ILC being developed and should be discussed between the Ministry of Transport, RTA and Councils. SPC will keep records of truck movements from the ILC outbound from the Cosgrove Rd access point during morning and evening peaks. Intersection monitoring is the responsibility of relevant Government agencies. The INTANAL intersection modelling allows for the different characteristics of heavy vehicles and the effect that these have on traffic flow.		
Traffic	One-way pair option to be carried out for Cosgrove Road	Providing access to the ILC via Gould Street has been examined by SPC previously (for a larger proposed development with a different layout and business model), and was found to be unworkable. However, purely from a traffic perspective, SKM have examined the RTA's proposal in SCATES, using only Hume Highway / Cosgrove Road flows (no data is available on volumes at the Gould Street intersection). Subject to the limitations of this approach, we found that operation under current volumes would be acceptable at both intersections. However in the future eastbound widening of the Hume Highway would be required even without the ILC traffic.	Not allocated	Comments from Attachment 1 – RTA Comments on Environmental Assessment Report Traffic Generation Impacts of the Current Proposal
	Truck movements in a typical morning peak hour are estimated assuming that 85% of truck activity occurs on weekdays, and 7.5% to 8.6% of those daily movements are in the morning peak hour. The Port Botany EIS reported about 8.2% of container truck movements (240 out of 2913)	The daily profile was estimated based on the Port of Melbourne, which has a similar operating profile to that proposed. The 22-hour operation of the ILC allows the peak hour impact to be less than would otherwise be expected i.e. through spread of traffic movements.		

Issue Category	Comments	Response	Stakeholder ID	Name
	in the peak			
	Total truck movements are predicted to be 88 per hour in the morning peak (an independent calculation using the parameter values reported in the EA produced 90 movements per hour). If current (2001) parameters were adopted for container transport, and a load factor assumed to be 7 tonnes of loose freight per truck, 128 movements per hour would be predicted	The difference between 88 and 90 may be due to rounding. The 2 vehicle difference would make a very small impact on the findings of the EA. We used the latest available (2004/5) data from SPC regarding container weights and the 20ft vs 40ft container ratio. These were verified as appropriate by SKM.		
	Figures 4.3 and 4.4 and Tables 4-4 and 4-5 of Volume 2 show the peak hour traffic impacts of the proposals at a very limited set of locations, and do not give a clear picture of how the generated traffic disperses through the surrounding road network. More detailed plots of the modelled traffic flows are needed	The plots provided in the EA account for the vast majority of ILC trucks. Beyond the immediate area the number of trucks is negligible. The study area was agreed between SPC and RTA representatives.		
	These tables and plots show the truck and car movements generated by the site, but do not provide any details of the truck movements in the background traffic stream. Their impacts are dismissed with the statement that "the absolute number of heavy vehicles is small …. (generally less than 1% of total traffic)". The percentage increase in truck numbers would be substantially higher.	The truck numbers are shown in the figures. The percentage increase in truck numbers would be higher due to the smaller base, even if the real increase is small.		
	For example, Table 4-4 shows an increase of 10+9=19 trucks in the AM peak hour on the Hume Highway west of Centenary Drive. This is an increase of 0.3% on the background traffic flow of 4038+2747=6785. However this section of the Hume Highway carried 9.1% heavy vehicles in 2002. That suggests that background truck volume might be around 600 trucks per hour and the Enfield traffic represents 3% increase in truck volumes.	Figures 7-5a and 7-5b show the total number of heavy vehicles as well as the number related to the ILC. For example, on Roberts Road south of Norfolk Road, there would be over 200 heavy vehicles in each direction during the AM peak hour, with the ILC contributing about 6% (12 northbound and 14 southbound). On the Hume Highway, there are about 700 heavy vehicles in the AM peak hour, with the ILC contributing 2.7% (10 eastbound and 9 westbound). These hourly volumes of ILC trucks are small compared with the base flows.		
	A key argument in the EA is that critical intersections will be over-saturated by 2016, without any additional traffic generated by the Enfield development, and therefore upgrading works should be the RTA responsibility (Section 4.4, Volume 2 refers) Table 4.4 lists modelled link flows, some of which show surprisingly high growth between 2005 and 2016. A comparison with the RTA standard models is tabulated below Table shows ■ Boronia Road East of Hume Highway. EA growth of 5.5% and RTA growth of 0.5% p.a. ■ Hume Highway West of Centenary. EA growth of 1.9% and RTA growth of 0.5% p.a. ■ Hume Highway East of Cosgrove. EA growth of 2.2%	Traffic on these roads would include not only local traffic but also through traffic (especially on the Hume Highway). There may also be switching to roads like Boronia Road due to congestion on other links in the network. Thus the growth rate on individual links may be higher than the growth in surrounding land use might indicate. Although RTA growth on Boronia Rd is low compared with EA, RTA's base volume is well in excess of observed volumes (around 430 EB and 480 WB during AM peak). The RTA's 2016 volumes exceed the EA forecast also, suggesting that maybe the growth has been underestimated.		

Issue Category	Comments	Response	Stakeholder ID	Name
	and RTA growth of 0.8% p.a. Given that these roads are located in a middle-ring suburban area, with little growth in surrounding population or employment anticipated in the next ten years, it is hard to understand why they should experience very rapid growth of 2-5% p.a.	RTA's Hume Highway 2005 volumes are low compared with actual volumes. SKM growth on the Hume Highway has been checked against growth from permanent station counts.		
	The following is a summary of the existing operational performance at those intersections surrounding the proposed ILC site	Noted		
	Intersection of Liverpool Road (Hume Highway) and Cosgrove Road (#1088)			
	Current Capacity and Operational Performance: ■ Two through lanes on Liverpool Road with one right turn lane on eastern approach widened to three lanes downstream ■ Three lanes through the intersection for the westbound approach ■ Two lanes on northbound Cosgrove Road approach ■ Moderate to high peak traffic volumes through the intersection ■ Peak operation runs at four phases with the highest cycle time of 140 seconds ■ This is some scope for more "peak" spreading Possible Improvements ■ A left slip lane from Cosgrove Road approach is possible with the Vacant Lot ■ A third through lane for the eastbound direction is possible with some acquisition from the open space on the northern side of Liverpool Road	SKM Existing LoS = C in AM peak and D in PM peak Future LoS – without ILC = F in AM and PM peak Future LoS – with ILC = F in AM and PM peak Agree with current capacity and operational performance as stated. Agree these possible improvements could be made. However the capacity of the intersection is worsened by the right turn movement out of Cosgrove (as the peak direction of traffic is eastbound on the Hume Highway) These intersection improvements are required even without the ILC in the future.		
	Intersection of Roberts Road and Norfolk Road (#2555)			
	Current Capacity and Operational Performance: ■ Three through lanes with one right turn lane in each direction on Roberts Road and two lanes in each of the Norfolk Road approaches ■ Peak operation runs at three phases wit the highest cycle length of 140 seconds ■ Peak volumes moderate to high ■ There is some room for "peak" spreading Possible Improvements ■ There is scope for right turn bays in both directions	SKM Existing LoS = B in AM peak and B in PM peak Future LoS – without ILC = B in AM and C in PM peak Future LoS – with ILC = C in AM and C in PM peak Agree with current capacity and operational performance as stated. Agree with possible improvements – except right turn bay extension into Norfolk Road west will not be affected by ILC operation. The splayed left turn is recommended to enable a safer negotiation of the junction using B-double vehicles. A		

Issue Category	Comments	Response	Stakeholder ID	Name
	on Roberts Road to be extended ■ There is a potential for a left slip lane to be constructed from Roberts Road (north approach) to Norfolk Road approach (east approach) using a portion of the vacant lot ■ There may be scope for limiting traffic filtering through Norfolk Road east into the local residential area by traffic management measures	draft traffic management plan has been prepared – and discussed with the RTA - which will aid in preventing through traffic movement from Norfolk Road east into the residential areas (in addition to those load limits which currently apply).		
	Intersection of Roberts Road and Juno Parade (#1449)			
	Current Capacity and Operational Performance: ■ Three through lanes with both right turn and left turn lanes on each direction in Roberts Road ■ Two through lanes in each direction on Juno Parade with two right turn lanes on the west approach and one right turn lane on the east approach ■ Peak volume through the intersection are high with little spare capacity or scope for peak spreading ■ Peak operation runs at four phases with highest cycle length on 140 seconds Possible Improvements ■ There is some scope for a limited extension of the right turn bay in both directions on Juno Parade ■ There is potential for extending the right turn bays in Roberts Road in both directions ■ There is potential for a left turn slip lane to be constructed from Juno Parade (west approach) to Roberts Road (north approach) utilising a portion of the open space in the north-west corner	SKM Existing LoS = E in AM peak and D in PM peak Future LoS – without ILC = F in AM and F in PM peak Future LoS – with ILC = F in AM and F in PM peak Agree with current capacity and operational performance as stated and the possible improvements that could be made. These intersection improvements are required even without the ILC in the future		
	Intersection of Punchbowl Road and Cosgrove Road (#915)			
	Current Capacity and Operational Performance: ■ Three through lanes in each direction on Punchbowl Road with a separate right turn lane on the east approach and a left slip lane on the west approach ■ Two lanes on north approach of Cosgrove Road with an exclusive right turn lane and a shared right and left turn kerb side lane ■ Peak volume on Punchbowl Road is high with moderate flows on the Cosgrove Road approach ■ There is some room for “peak” spreading Possible Improvements ■ There is little scope for any physical improvement without major civil works and land acquisition	We do not anticipate any ILC truck traffic using this intersection. Detailed analysis has not been undertaken for the EA. Punchbowl Road has only 2 through lanes per direction.		

Issue Category	Comments	Response	Stakeholder ID	Name
	■ Heavy vehicle flows from Cosgrove should be limited due to presence of residential properties along the eastern side of Cosgrove Road south of the Begnell Park.			
	Intersection of Punchbowl Road and King Georges Road (#915)			
	Current Capacity and Operational Performance: ■ Two through lanes with a right turn bay in each direction of Punchbowl Road ■ Three through lanes on the north-south direction along Wiley Ave-King Georges Road. Only two through lanes in the opposite direction with two right turn lanes from King Georges Road to Punchbowl Road (east) ■ Peak volumes are high, particularly in the north-south direction ■ Peak operation runs for four phases with the highest cycle time of 150 seconds ■ There is no scope for peak spreading Possible Improvements ? ■ There is some scope for providing a third through lane eastbound (west approach) along Punchbowl Road ■ There is some scope for providing a third though lane for the northbound along King Georges Road – Wiley Avenue, utilising the wide median island on Wiley Avenue and the parkland on the north eastern corner of the intersection	SKM Existing LoS = F in AM peak and F in PM peak Future LoS – without ILC = F in AM and F in PM peak Future LoS – with ILC = F in AM and F in PM peak Agree with current capacity and operational performance as stated. This intersection improvement is required now - even without the ILC in the future		
	It appears that the above intersections along Roberts Road have been analysed individually without the linking of cycle times. A better analysis of the operation of these intersections would have been provided using other models (eg SCATES) which provides for the co-ordination of the traffic signals in the area.	Modelling of the Roberts Road intersections in SCATES was not completed for the following reasons: * The distances between the intersections (eg 580m between Norfolk Road and Amarina Ave) are such that arrival patterns would be fairly random, a situation with which INTANAL is best suited. However it is noted the SKM results along Roberts Road are similar to the RTA's analysis of intersection performance. * Smaller intersections that would be only marginally affected by ILC traffic, such as Amarina Avenue and Rawson Road, have not been modelled as part of the EA.		
	Planning Issue			

Issue Category	Comments	Response	Stakeholder ID	Name
	A development proposal has come to the RTA for comment. The site is the parcel of land fronting the Hume Highway and extending from Cosgrove Road to Gould Street with Gill Lane being parallel to the Highway. An 'Oporto Chicken' outlet and tile showroom are proposed. If widening of Cosgrove Road and Hume Highway is recommended for a left turn lane out of Cosgrove Road, it would be necessary to immediately reserve the required strip so that any proposed development on the site can be constructed behind the reservation.	Noted. The upgrade to this intersection is required in the future even without the ILC. The left turn lane out of Cosgrove Road is not an essential upgrade to improve intersection operation. The key component is the eastbound widening for 3 lanes. Adoption of the One-way pair option may affect traffic and access assumptions of the development proposal.		
	Summary			
	In the RTA's view – some of the assumptions in the EA are optimistic. The rate of development growth is not anticipated to be as high as that proposed.	Traffic growth may be greater than local development growth on certain roads due to through traffic, and switching away from congested routes.		
	Nor is the degree of backloading likely to rise from the current 8% to 30% without significant improvements to goods handling in the industry and / or technological innovation	30% backloading was accepted for use in the Port Botany EIS. This target is expected to be reached at Enfield due to an increase in multiple vehicle trip cycles, and the multiple and complementary container business types on site.		
	Over time, the number of B-doubles accessing the site is expected to increase. This may reduce total number of heavy vehicles accessing the site	An increase in B-double use may reduce total traffic generation, although the impact of a smaller number of larger vehicles is likely to be similar to the stated impacts.		
	The key intersections still have some capacity (with the exception of Punchbowl Road / King Georges Road) but without detailed SCATES modelling it is difficult to determine best operating options for these intersections	We consider that the INTANAL analysis presented is sound for the purposes of evaluating intersection performance. The SKM traffic assessment provided comparable current intersection performance to the RTA assessment.		

Issue Category	Comments	Response	Stakeholder ID	Name
	Provided the appropriate widening and roadworks are carried out, access to the site via Cosgrove Road and Norfolk Road is considered to be less detrimental to traffic flow than if Cosgrove Road remains a two-way road. While the one-way pair option of Cosgrove Road and Gould Street was dismissed earlier in the study, it should be re-examined as it has several benefits. It is thought that a SCATES analysis would show traffic signals operating more efficiently at the 2 intersections with the Hume Highway.	See previous comment		
	It would also allow retention of on-street parking on Cosgrove Road, something all the industries were adamant about.	Agree that this would be a benefit of the one-way pair option. It should also be noted however that the current ILC proposal for using Cosgrove Road as a second access does not limit on street parking.		
Traffic	Following the RTA's initial submission to the Department of Planning on the Environmental Assessment for the above proposed Centre (dated 2/3/06), the RTA has undertaken further work in investigating the performance of key intersections surrounding the proposed Enfield Intermodal Logistics Centre (ILC). These are detailed below along with costing of necessary works and some recommendations on heavy vehicle compliance and enforcement requirements.		860	Roads and Traffic Authority **DoP Submission No 321**
	1. Modelling Results Using "SCATES"			
	The RTA has undertaken detailed modelling of the road network surrounding the Enfield site using SCATES model and has concluded that the SKM traffic analysis was not comprehensive enough to indicate the operational performance of linked intersections along Roberts Road and also along Hume Highway.	Noted. SKM did not analyse the linked junctions as it was considered that the junctions could be assessed as stand-alone junctions. The key reason being the distance between the respective intersections. The analysis undertaken by SKM is considered to be robust.		
	The RTA has investigated a number of options to improve the current and future performance of the following key intersections using its SCATES model: ▪ Cosgrove Road/Hume Highway ▪ Roberts Rd/Norfolk Rd ▪ Hume Highway/Roberts Rd/Centenary Drive	Noted.		

Issue Category	Comments	Response	Stakeholder ID	Name
	• Roberts Rd/Juno Parade • Centenary Drive/Arthur St • Hume Highway/Gould St (proposed new traffic signal site)			
	The modelling results show that any additional loading of heavy vehicles on the road network will adversely impact on the operational performance of the above intersections both in the construction phase and by 2016. Even though the number of heavy vehicles are relatively small compared to the total traffic volumes our modelling shows their impacts are significant. Our modelling also shows that the operational performance of the road network will be improved with a one-way pair option using Cosgrove Rd/Gould St.	SKM analysis shows that the development does not have a significant impact on the performance of the intersections. This is documented in the EA. SKM modelled the one-way pair subsequent to the submission of the EA. The intersection of Cosgrove Road / Hume Highway is improved by the one-way pair in the short term.		
	Cosgrove Rd/Hume Highway We agree with the SKM analysis that this intersection needs upgrading. However, the operational performance of this and other intersections along the Hume Highway would be improved by a one-way pair option by making Cosgrove Rd (south bound) and Gould St (northbound) as a one-way pair. The total cost of works required at this intersection is estimated at about $3m.	In the short term the performance of this intersection will improve. However, wider network issues still need to be taken into consideration.		
	Sydney Ports Corporation (SPC) claim that this entry/exit point at Cosgrove Rd would only be used by a small number of heavy vehicles to access the Intermodal Logistics Centre (ILC). The RTA is, nevertheless, concerned that additional vehicles from the ILC will impact the intersection. In view of the cost involved in upgrading this intersection it was agreed that SPC would submit, for consideration by the RTA, measures to limit the number of heavy vehicles from using Cosgrove Rd as an entry/exit point. This may obviate the need to upgrade this intersection in the short term.	SPC will submit for consideration of the RTA, measures to limit the number of B-doubles leaving from the ILC via Cosgrove Road during AM & PM peak periods.		
	Roberts Rd/Norfolk Rd This intersection performs adequately now. However, with the ILC in place there would be a need to upgrade this intersection to accommodate 26m B-Double turning movements into/out of Norfolk Rd onto Roberts Rd for both physical turning capacity and safety reasons. The cost of these works is estimated at about $3.6m. SPC have agreed to pay for these works.	SPC is committed to improving the layout of this junction in consultation with the RTA to enable improved access for B-doubles at this point. A breakdown of the costs has not been undertaken. This will be undertaken during detailed design.		

Issue Category	Comments	Response	Stakeholder ID	Name
	2. Local Area Traffic Management (LATM)			
	The area bordered by Roberts Road, Hume Highway and Juno Parade is predominantly residential, containing a number of schools. For this reason it is important that heavy vehicle movements associated with the ILC be constrained to the major road network and not travel through residential areas when travelling to or from the ILC.	The movement of ILC trucks through the residential area will be restricted and managed through LATM measures to be undertaken in consultation with the RTA and Council.		
	A range of traffic management measures will be required in the area to ensure that these movements are deterred, while still allowing access by residents and minimal impact on existing bus routes. While detailed design of these measures has not been undertaken, it is anticipated that up to $1 million will be required.	Costing of LATM measures has not been undertaken. The key measure is the redesign of Roberts Road / Norfolk Road intersection to prevent vehicles from accessing the residential areas. The possible movement of ILC trucks through the residential area will be restricted, and managed through LATM measures to be undertaken in consultation with the RTA and Councils.		
	3. Costing of Required Road Works			
	The RTA currently does not have any plans or funds available for future widening of the Hume Highway at Cosgrove Rd or at the other intersections mentioned above for the foreseeable future.	Noted.		
	The ILC will be severely constrained in its operational performance if the intersection improvements are not made during the construction phase of the ILC. Improvements will be required at the key intersections of Roberts Rd/Norfolk Rd as well as at the Hume Highway/Cosgrove Rd intersection if the ILC is to perform adequately.	It is not considered that the ILC will be severely constrained in its operational performance if the improvements are not made during the construction phase of the ILC. However, SPC will undertake to improve the junction of Roberts Road / Norfolk Road at this stage. No improvements are considered at the Hume Highway / Cosgrove Road intersection.		
	The total cost of intersection improvements and the cost of the Local Area Traffic Management (LATM) measures is of the order of $35m. The costs of the improvements are summarised below.	The total costs of any improvements to be undertaken will be subject to detailed design.		
	• Hume Highway/Cosgrove Rd (one-way pair option of Cosgrove Rd and Gould St including pavement reconstruction on Hume Highway) - $31m (est. cost) • Roberts Rd/Norfolk Rd (safety improvements) - $3.6m (est. cost) • LATM - $0.5-$1.0m (est. cost)	Noted that these are RTA estimates only.		

Issue Category	Comments	Response	Stakeholder ID	Name
	The above costs are strategic estimates only without any detailed concept plans. As previously estimated the bulk of this cost is for the Cosgrove Rd/Hume Highway intersection.	Noted. Improvements at this intersection is not necessary due to the ILC. SPC will monitor the number of heavy vehicles from the site using this intersection.		
	The RTA would not be improving these intersections for the foreseeable future and if they are required to be brought forward to meet the needs of the ILC then it is appropriate that the developer contribute to the cost of the works. This is a matter for discussion and negotiation with the proponent.	Noted.		
	4. Compliance and Heavy Vehicle Regulations			
	Access B-Double trucks will be in operation to and from the site. In planning access to and around the site consideration must be given to the Road Transport (General) Act 2005 General B-Double Notice under Division 4 of Part 2 of the Road Transport (Mass, Loading and Access) Regulation, 2005. This Regulation specifies the areas and routes on which B-Doubles may be used and any restrictions on usage. The access routes proposed are contained within the Regulation; however there are restrictions on some of the roads proposed, particularly in relation to Norfolk Road and Cosgrove Road. These must be observed in the planning phase.	Noted.		
	The access routes to the site should be assessed for any potential access issues for oversize vehicles greater than the standard 4.3m height dimension, specifically vehicles up to 4.6m height.	Noted.		
	Consideration should also be given to the rules relating to Higher Mass Vehicles. Please refer to Road Transport (Mass, Loading and Access) Regulation 2005 Higher Mass Limits Routes.	Noted.		
	The construction of a new road bridge is included in the proposals. Construction planning will need to take into account the potential vehicle mass and the vehicle configuration using the infrastructure.	Noted.		

Issue Category	Comments	Response	Stakeholder ID	Name
	Mass and Compliance The RTA notes that the site management traffic plan will include compliance with safe load practices and address vehicle weight-of-load thresholds on the road network in accordance with the Road Transport (General) Act, 2005. The RTA recommends appropriate compliance systems are incorporated into the ILC to assist all parties with compliance, for example, mechanisms for checking the gross combination mass of the vehicles. Consideration should also be given to putting in place mechanisms to allow over mass containers to be broken down to compliant levels.	Noted.		
	The RTA welcomes measures to ensure that heavy vehicles travelling to and from the ILC use appropriate routes and do not travel through residential areas. The RTA is happy to be consulted during the development of Local Area Traffic Management (LATM) measures, particularly in relation to speed zoning, noise reduction and emissions management.	Appropriate LATM measures will be considered to prevent heavy vehicles from the ILC using residential streets to access the arterial road network. 3-tonne load limits are already in place.		
	Parking The report states that likely number of parking spaces should be based on the anticipated number of employees on the site. It is acknowledged that parking arrangements for trucks and cars on site will be addressed as part of the detailed design of the project. The RTA recommends that the following issues are taken into account for the parking arrangements for trucks: • Capacity to part trucks determined by their dimensions (noting that it is anticipated that the facility will be accessed by B-Doubles). • The volumes of trucks accessing the site and at peak times – it will be important that the queuing and parking facilities are of sufficient capacity so that compliance with the prohibition from using local roads can be observed at all times. • Turning paths for trucks to facilitate movement around parking areas and the site. • Consideration given to the community parking and access requirements for the community recreation and ecological areas to ensure their separation from trucking activities.	Noted.		
	Queuing The report estimates that during the peak of activity, there will be about 52 truck arrivals in a one-hour period entering the site. Each truck, upon arrival at one of the access points, will travel to the relevant facility in the site. All traffic will be accommodated on-site and managed by traffic management plans.	Noted		

Issue Category	Comments	Response	Stakeholder ID	Name
	The RTA supports the proposal that all traffic is accommodated on-site. The RTA also supports the development of a site traffic management plan to bind all lessees and transport operators to a central objective of developing the ILC site as a model of good practice. The RTA is happy to be consulted during its development.	Noted.		
	Fatigue Management The RTA recommends that parking and queuing arrangements for trucks is considered in light of safety standards for good fatigue management for truck drivers. The National Transport Commission is currently co-ordinating fatigue management guidelines and the RTA recommends that these are referred to in the development of the site.	Noted.		

Issue Category	Comments	Response	Stakeholder ID	Name
Vibration	**Noise and vibration-** Reference to the proposed duplication project between mascot and Botany yard. RailCorp advises that this project is on hold, and that it has not proposed a preferred method of noise mitigation without undertaking extensive stakeholder consultation	Noted	582	(RailCorp **DoP Submission No 180**

Appendix E Traffic Modelling Technical Report

1 Traffic Modelling

1.1 Introduction

SKM were requested to re-calibrate both the AM and PM peak models, to provide a better statistical fit and to increase acceptance against the calibration criteria as set out in the UK Design Manual for Roads and Bridges. These criteria and the results are shown in **Appendix A**.

SKM were also requested to assess the data against 2002 screenline counts. This analysis is shown in **Section 1.4** and **Appendix A.2.**

For ease of comparison, the following sections of this note have been replicated from the relevant sections of the Transport Working Paper, contained as Appendix B of the Environmental Assessment.

These recalibrated models have been reviewed, and are suitable for use in the transport assessment of the Intermodal Logistics Centre at Enfield. They confirm the level of base network activity and the marginal impact that the ILC will have on the surrounding traffic.

1.2 Road Network Link Capacity Assessment

Based on the re-calibrated AM and PM network modelling results, an assessment of the road link capacity was undertaken. Link capacity refers to the ability of a road to cater for demand at mid-block (between intersections) locations, and is a factor of the number of lanes, type of road, and adjacent development. Theoretical link capacities have been estimated for key roads in the study area. The results in **Table 1-3** show that in 2005, roads such as the Hume Highway are at or approaching their theoretical capacity, represented by a degree of saturation of 0.9 or greater (the practical capacity of a link, when traffic flow begins to break down, is typically around 90% of the theoretical capacity). In the 2016 base case, the Hume Highway is the most saturated link and is anticipated to be operating within its theoretical capacity both with and without Enfield Intermodal Logistics Centre in place.

The impact of the Enfield Intermodal Logistics Centre on link capacity, is a marginal change in degree of saturation. Roads such as Cosgrove Road and Wentworth Street, experience a relatively large increase in degree of saturation compared with other roads. This is due to the smaller base volume of traffic on these roads, resulting in a larger proportional increase in traffic, although the absolute increase is small. These links were chosen to represent the immediate boundary of the study area, as it will be these locations where the maximum impact occurs (see **Table 1-1** and **Table 1-2**). The AM and PM 2005 and 2016 traffic volumes are shown in **Figure 1-1** and **Figure 1-2** respectively. These have been replicated and amended from **Figure 4-3** and **Figure 4-4** of the Transport Working Paper.

- ***Table 1-1 Modelled Future Traffic Volume AM Peak – All Vehicles***

Street Name	Location	Direction	2005	2016		Change with ILC	2016 ILC	
				Without ILC	With ILC		Trucks	Cars
Boronia Road	E of Hume Hwy	Eastbound	429	693	688	-1%	3	6
Boronia Road	E of Hume Hwy	Westbound	388	807	824	2%	3	0
Centenary Drive	S of Barker Road	Northbound	4,018	4,416	4,346	-2%	20	0
Centenary Drive	S of Barker Road	Southbound	3,190	3,332	3,390	2%	23	19
Cosgrove Road	S of Hume Hwy	Northbound	436	459	484	5%	1	0
Cosgrove Road	S of Hume Hwy	Southbound	452	466	611	31%	3	56
Georges River Road	E of Coronation Pde	Eastbound	1,385	1,292	1,277	-1%	0	0
Georges River Road	E of Coronation Pde	Westbound	1,137	1,298	1,323	2%	0	13
Hume Highway	W of Centenary Drive	Northbound	3,463	4,451	4,404	-1%	10	5
Hume Highway	W of Centenary Drive	Southbound	2,573	2,958	2,929	-1%	9	0
Hume Highway	E of Cosgrove Road	Eastbound	2,447	3,301	3,280	-1%	1	0
Hume Highway	E of Cosgrove Road	Westbound	1,954	2,371	2,448	3%	0	54
Hume Highway	N of Stacey Street	Northbound	2,608	2,536	2,532	0%	3	5
Hume Highway	N of Stacey Street	Southbound	1,795	1,749	1,773	1%	3	0
Roberts Road	S of Norfolk Road	Northbound	2,506	2,593	2,589	0%	12	36
Roberts Road	S of Norfolk Road	Southbound	1,892	1,868	1,899	2%	14	0
Wentworth Street	E of Roberts Road	Northbound	73	120	163	36%	42	0
Wentworth Street	E of Roberts Road	Southbound	239	317	414	31%	40	57

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SKM

- ***Table 1-2 Modelled Future Traffic Volume PM Peak – All Vehicles***

Street Name	Location	Direction	2005	2016		Change with ILC	2016 ILC	
				Without ILC	With ILC		Trucks	Cars
Boronia Road	E of Hume Hwy	Eastbound	495	568	571	1%	2	0
Boronia Road	E of Hume Hwy	Westbound	429	775	785	1%	3	1
Centenary Drive	S of Barker Road	Northbound	3,041	3,659	3,649	0%	10	14
Centenary Drive	S of Barker Road	Southbound	3,766	3,772	3,772	0%	13	0
Cosgrove Road	S of Hume Hwy	Northbound	507	551	762	38%	1	87
Cosgrove Road	S of Hume Hwy	Southbound	472	558	534	-4%	3	0
Georges River Road	E of Coronation Pde	Eastbound	1,051	1,037	1,033	0%	0	5
Georges River Road	E of Coronation Pde	Westbound	1,307	1,254	1,263	1%	0	0
Hume Highway	W of Centenary Drive	Northbound	2,174	2,851	2,854	0%	6	0
Hume Highway	W of Centenary Drive	Southbound	2,972	3,874	3,854	-1%	8	3
Hume Highway	E of Cosgrove Road	Eastbound	1,721	2,714	2,861	5%	1	87
Hume Highway	E of Cosgrove Road	Westbound	2,236	3,064	3,004	-2%	1	0
Hume Highway	N of Stacey Street	Northbound	1,786	1,787	1,791	0%	2	0
Hume Highway	N of Stacey Street	Southbound	2,665	2,638	2,646	0%	3	2
Roberts Road	S of Norfolk Road	Northbound	1,937	2,571	2,544	-1%	8	0
Roberts Road	S of Norfolk Road	Southbound	2,488	2,116	2,186	3%	9	19
Wentworth Street	E of Roberts Road	Northbound	148	221	286	29%	25	35
Wentworth Street	E of Roberts Road	Southbound	74	109	137	26%	23	0

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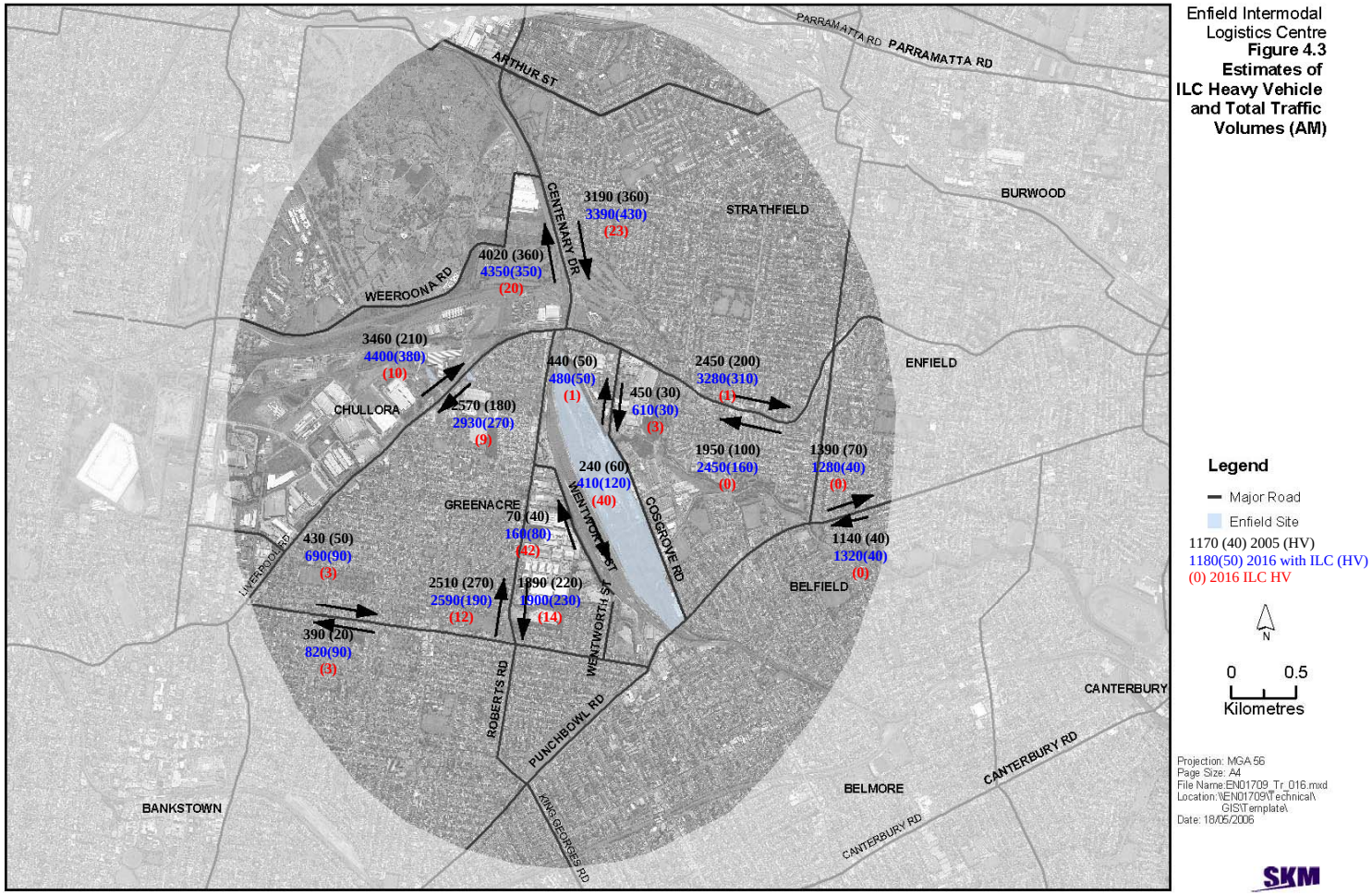
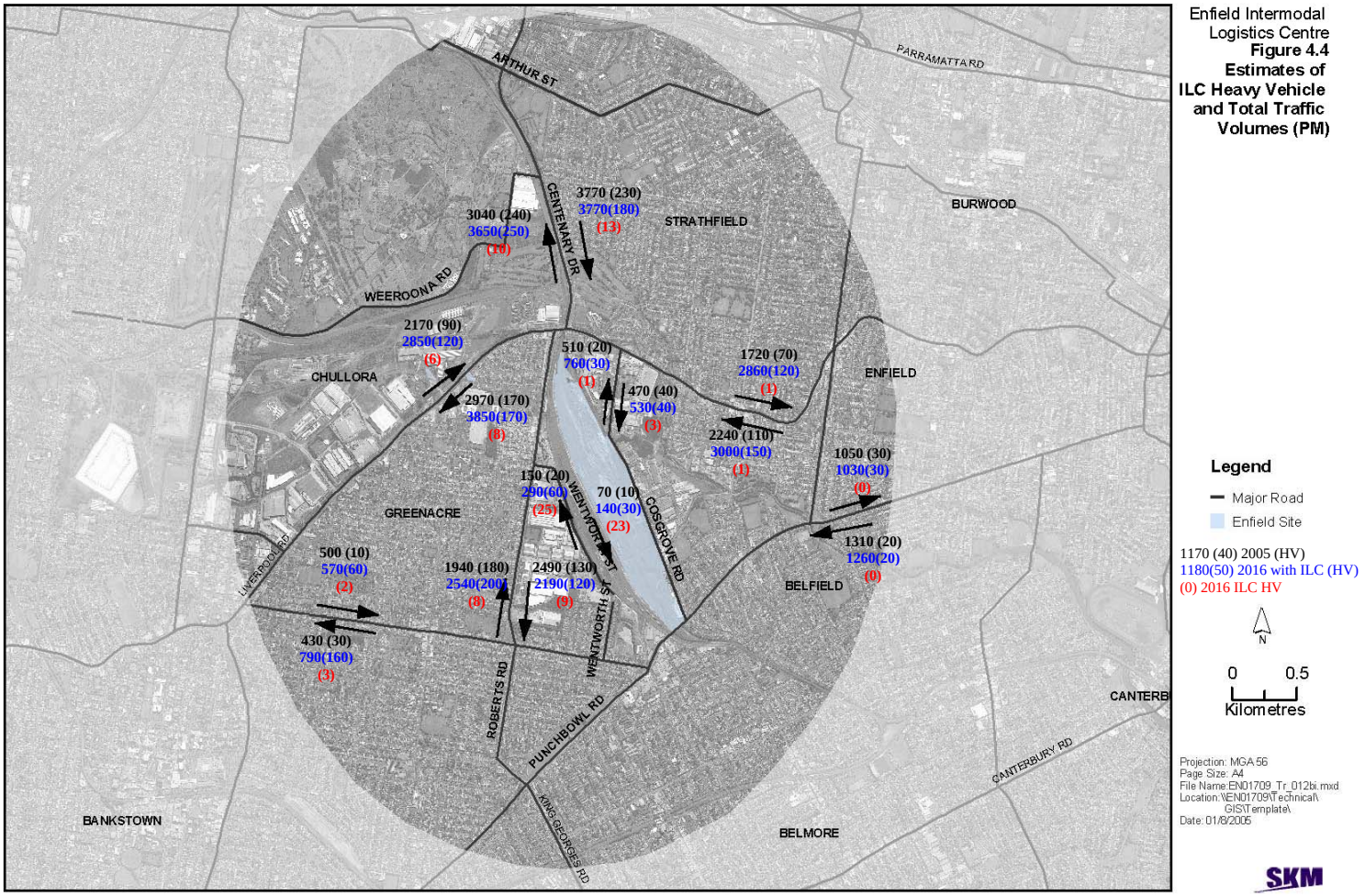
- ***Figure 1-1 Estimates of Intermodal Logistics Centre Heavy Vehicle and Total Volumes (AM Peak)***



- ***Figure 1-2 Estimates of Intermodal Logistics Centre Heavy Vehicle and Total Volumes (PM Peak)***



- ***Table 1-3 Link Capacity Assessment***

Table 4-6 Link Capacity Assessment

Street	Location	Direction	Capacity per hour	Degree of Saturation					
				AM			PM		
				2005	2016 Base	2016 With Enfield	2005	2016 Base	2016 With Enfield
Boronia Road	E of Hume Highway	EB	1,800	0.24	0.39	0.38	0.28	0.32	0.32
Boronia Road	E of Hume Highway	WB	1,800	0.22	0.45	0.46	0.24	0.43	0.44
Centenary Drive	S of Barker Road	NB	4,800	0.84	***0.92***	***0.91***	0.63	0.76	0.76
Centenary Drive	S of Barker Road	SB	4,800	0.66	0.69	0.71	0.78	0.79	0.79
Cosgrove Road	S of Hume Highway	NB	900	0.48	0.51	0.54	0.56	0.61	0.85
Cosgrove Road	S of Hume Highway	SB	900	0.50	0.52	0.68	0.52	0.62	0.59
Georges River Road	E of Coronation Parade	EB	1,800	0.77	0.72	0.71	0.58	0.58	0.57
Georges River Road	E of Coronation Parade	WB	1,800	0.63	0.72	0.74	0.73	0.70	0.70
Hume Highway	W of Centenary Drive	NB	2,900	***1.19***	***1.53***	***1.52***	0.75	***0.98***	***0.98***
Hume Highway	W of Centenary Drive	SB	2,900	0.89	***1.02***	***1.01***	***1.02***	***1.34***	***1.33***
Hume Highway	E of Cosgrove Road	EB	1,900	***1.29***	***1.74***	***1.73***	***0.91***	***1.43***	***1.51***
Hume Highway	E of Cosgrove Road	WB	1,900	***1.03***	***1.25***	***1.29***	***1.18***	***1.61***	***1.58***
Hume Highway	N of Stacey Street	NB	2,900	0.90	0.87	0.87	0.62	0.62	0.62
Hume Highway	N of Stacey Street	SB	2,900	0.62	0.60	0.61	***0.92***	***0.91***	***0.91***
Roberts Road	S of Norfolk Road	NB	2,900	0.86	0.89	0.89	0.67	0.89	0.88
Roberts Road	S of Norfolk Road	SB	2,900	0.65	0.64	0.65	0.86	0.73	0.75
Wentworth Street	E of Roberts Road	NB	900	0.08	0.13	0.18	0.16	0.25	0.32
Wentworth Street	E of Roberts Road	SB	900	0.27	0.35	0.46	0.08	0.12	0.15

Note: The text in bold italics indicates where volume/capacity ratio exceeds 0.9, which indicates congested conditions.

NB = northbound, SB = southbound, EB = eastbound; WB = westbound

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1.3 Intersection Assessment

The operation of key intersections within the identified study area has been assessed both with and without an Enfield Intermodal Logistics Centre for the year 2016. Input to the INTANAL models for each intersection were modelled flows extracted from the NETANAL model. Traffic volumes and turning movements were extracted from the network model for intersections identified as critical to the evaluation of the impact of the ILC. These intersections had also been surveyed. Due to the aggregated nature of travel zones and the consequential simplification of intersection traffic, the difference between actual and modelled traffic movements are identified. These are used to adjust forecast traffic movements using an iterative process to increase confidence in the calibration of the network model.

The results of the intersection assessment are presented in **Table 1-4**.

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- ***Table 1-4 Future Intersection Operation***

	AM Peak					PM Peak				
	2005	2016 Base		2016 With Enfield ILC		2005	2016 Base		2016 With Enfield ILC	
Intersection	LoS	Av Del	LoS	Av Del	LoS	LoS	Av Del	LoS	Av Del	LoS
Roberts Road / Juno Parade	E	140	F	145	F	D	139	F	138	F
King Georges Road / Punchbowl Road	F	>200	F	>200	F	F	>200	F	>200	F
Georges River Road / Coronation Parade	B	17	B	17	B	A	11	A	12	A
Roberts Road / Norfolk Road	B	24	B	27	B	B	29	C	37	C
Hume Highway / Boronia Road	B	22	B	16	B	B	27	B	27	B
Hume Highway / Roberts Road / Centenary Drive	F	>200	F	>200	F	D	>200	F	>200	F
Hume Highway / Cosgrove Road	C	>200	F	>200	F	D	>200	F	>200	F
Hume Hwy/ Cosgrove Road Reconfigured (see §1.3.1)		18	B	18	B		32	C	56	D
Hume Highway / Coronation Parade	C	166	F	190	F	B	95	F	89	F
Centenary Drive / Arthur Street	C	49	D	54	D	C	49	D	51	D
Centenary Drive / Weeroona Road	A	17	B	16	B	A	8	A	9	A

Table 1-4 shows that background growth in traffic to 2016 would result in several intersections operating at an unsatisfactory level of service. It also shows that there is very little difference in intersection operation in 2016, when comparing with and without Enfield Intermodal Logistics Centre scenarios. Saturated intersections include Roberts Road / Juno Parade, King Georges Road / Punchbowl Road, Hume Highway / Roberts Road / Centenary Drive, Hume Highway / Coronation Parade and Hume Highway / Cosgrove Road. These intersections would be saturated in 2016, with or without the Enfield Intermodal Logistics Centre.

1.3.1 Hume/Cosgrove Intersection

The Hume Highway / Cosgrove Road intersection is forecast to operate at Level of Service F in the future, regardless of any development of the ILC. The link capacity assessment (**Table 1-3**) also shows that this section of the highway would be congested in the future, regardless of the ILC. Based on this forecast, widening of this section of the Hume Highway would be recommended and would improve intersection operation. With three through lanes provided in each direction on the Hume Highway, the Level of Service would improve to LoS"B" in the AM Peak and LoS"C" in the PM peak. This configuration would also be suitable for the forecast traffic with the proposed Enfield Intermodal Logistics Centre in operation. See **Table 1-4.**

Although the main site access point would be via Wentworth Street, up to 25% of trucks are assumed to use the Cosgrove Road site access. As a sensitivity test, assessment of the Cosgrove /Hume Highway intersection with various levels of truck activity via Cosgrove Road was undertaken. If 100% of truck activity were via Cosgrove Road, then operation of the upgraded intersection (with 6 lanes on the Hume Highway) would only marginally exceed the threshold for Level of Service "E". With 50% of ILC truck activity via Cosgrove Road, the Level of Service was only marginally above the threshold for "D". However, the anticipated level of truck activity via Cosgrove Road is much less than this, and the intersection is therefore expected to operate at a satisfactory level of service in the majority of instances of upgrades.

The proponent has proposed to restrict egress outbound from the ILC onto Cosgrove Road during commuter peak periods to limit the impact on the intersection with the Hume Highway. This commitment will be declared in the proponent's Preferred Project Report.

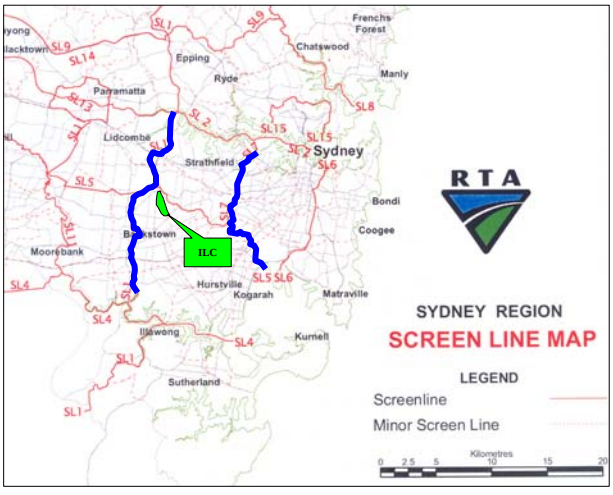
1.3.2 Roberts/ Norfolk Intersection

From a traffic volume perspective, the Roberts Road / Norfolk Road intersection is operating with spare capacity and no intersection enhancement is required. However, intersection geometry will require alteration in agreement with RTA to better provide for movement of articulated vehicles and enhanced visibility. This commitment will be declared in the proponent's Preferred Project Report.

1.4 Regional Impact Zone

To assess the likely impact of the Enfield ILC on regional traffic, traffic volumes were extracted from the network model along recognised RTA screenlines to the east of the ILC (between the ILC and Port Botany) and to the west of the ILC. The easterly screenline will be affected by the changes in traffic resulting from the transfer of container activity from Port Botany to Enfield. However, the western screenline is between the ILC and its target market. These screen lines are depicted in **Figure 1-3**.

- **Figure 1-3 Screenline Location**



Of critical importance is whether the presence of ILC traffic causes any route significant switching on screenline routes, albeit that they are remote from the development site.

Traffic volumes are reported in **Table 1-5** and **Table 1-6**.

It will be noted that the highest relative change is 5% (in the AM Peak) and is equivalent to only 83 vehicles.

A further comparison between the modelled volumes for the 2016 base and the 2016 with ILC scenarios along these combined screenlines indicates that they are statistically identical for both the AM and the PM peaks. This is based on the standard GEH statistical thresholds used in the model calibration (see **Appendix A**). This indicates 100% of the screenline links comply with the threshold GEH values and 100% of the links comply with the absolute difference threshold.

As such, it must be concluded that the Enfield ILC has no significant regional impact.

- ***Table 1-5 Screenlines 1 and 5&7 AM Peak Traffic volumes with & without ILC***

RTA Location	Description	2016 AM Base	2016 AM With ILC	Effect of ILC	GEH Statistic	[GEH<5] >85%	700-2700 [MAD<15%] >85%	<700 [MAD<100] >85%	>2700 [MAD<400] >85%
29142	Australia Ave, W of Homebush Bay Dr	1638	1721	5.1%	2.03	✓	✓		
28001V	M4, East of Homebush Bay Dr	7735	7683	-0.7%	0.59	✓			✓
27146V	Parramatta Rd, W of Centenary Dr	4747	4795	1.0%	0.69	✓			✓
28032	Arthur St, W of Centenary Dr	2663	2648	-0.6%	0.29	✓	✓		
43224	Brunker Ave, W of Hume Hwy	4424	4353	-1.6%	1.07	✓			✓
43239V	Hume Hwy, S of Boronia Rd	4285	4305	0.5%	0.31	✓			✓
43086	Wattle St, E of Stacey St	3449	3472	0.7%	0.39	✓			✓
43221	South Terrace, W of Punchbowl Rd	1839	1850	0.6%	0.26	✓	✓		
43084	Stacey St,N of Canterbury Rd	778	777	-0.1%	0.04	✓	✓		
43240V	Canterbury Rd, E of Fariford Rd	2961	2957	-0.1%	0.07	✓			✓
43032V	Henry Lawson Dr, at Salt Pan Ck	3189	3186	-0.1%	0.05	✓			✓
20067V	City West Link, at Hawthorne Canal	4069	4104	0.9%	0.55	✓			✓
20035	Marion St, at Hawthorne Canal	1371	1374	0.2%	0.08	✓	✓		
20012V	Parramatta Rd, W of Old Canterbury Rd	5491	5397	-1.7%	1.27	✓			✓
19193	Lonport St, W of Old Canterbury Rd	2123	2213	4.2%	1.93	✓	✓		
19192	Old Canterbury Rd, E of Edward St	1886	1860	-1.4%	0.60	✓	✓		
19189V	New Canterbury Rd, at Railway	2662	2652	-0.4%	0.19	✓	✓		
24212	Wardell Ave, at Cooks River	1650	1728	4.7%	1.90	✓	✓		
19041	Illawarra Rd, at Cooks River	1317	1254	-4.8%	1.76	✓	✓		
24210	Bayview Ave, at Cooks River	312	302	-3.2%	0.57	✓		✓	
23001V	Prnces Hwy, at Cooks River	6470	6458	-0.2%	0.15	✓			✓
23067V	Marsh St, at Cooks River	5948	5953	0.1%	0.06	✓			✓
23002V	General Holmes Dr, at Airport Tunnel	13370	13367	0.0%	0.03	✓			✓
					Compliance	**100%**	**100%**		

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- ***Table 1-6 Screenlines 1 and 5&7 AM Peak Traffic volumes with & without ILC***

RTA Location	Description	2016 PM Base	2016 PM With ILC	Effect of ILC	GEH Statistic	[GEH<5] >85%	700-2700 [MAD<15%] >85%	<700 [MAD<100] >85%	>2700 [MAD<400] >85%
29142	Australia Ave, W of Homebush Bay Dr	1528	1550	1.4%	0.56	✓	✓		
28001V	M4, East of Homebush Bay Dr	7349	7349	0.0%	0.00	✓			✓
27146V	Parramatta Rd, W of Centenary Dr	3826	3833	0.2%	0.11	✓			✓
28032	Arthur St, W of Centenary Dr	2539	2553	0.6%	0.28	✓	✓		
43224	Brunker Ave, W of Hume Hwy	3720	3701	-0.5%	0.31	✓			✓
43239V	Hume Hwy, S of Boronia Rd	4425	4437	0.3%	0.18	✓			✓
43086	Wattle St, E of Stacey St	2633	2636	0.1%	0.06	✓	✓		
43221	South Terrace, W of Punchbowl Rd	2048	2056	0.4%	0.18	✓	✓		
43084	Stacey St,N of Canterbury Rd	667	677	1.5%	0.39	✓		✓	
43240V	Canterbury Rd, E of Fariford Rd	2626	2627	0.0%	0.02	✓	✓		
43032V	Henry Lawson Dr, at Salt Pan Ck	3108	3113	0.2%	0.09	✓			✓
20067V	City West Link, at Hawthorne Canal	4121	4125	0.1%	0.06	✓			✓
20035	Marion St, at Hawthorne Canal	1531	1582	3.3%	1.29	✓	✓		
20012V	Parramatta Rd, W of Old Canterbury Rd	5508	5389	-2.2%	1.61	✓			✓
19193	Lonport St, W of Old Canterbury Rd	2476	2525	2.0%	0.98	✓	✓		
19192	Old Canterbury Rd, E of Edward St	2854	2894	1.4%	0.75	✓			✓
19189V	New Canterbury Rd, at Railway	2110	2126	0.8%	0.35	✓	✓		
24212	Wardell Ave, at Cooks River	1585	1589	0.3%	0.10	✓	✓		
19041	Illawarra Rd, at Cooks River	1356	1352	-0.3%	0.11	✓	✓		
24210	Bayview Ave, at Cooks River	270	271	0.4%	0.06	✓		✓	
23001V	Prnces Hwy, at Cooks River	6204	6197	-0.1%	0.09	✓			✓
23067V	Marsh St, at Cooks River	4826	4820	-0.1%	0.09	✓			✓
23002V	General Holmes Dr, at Airport Tunnel	13098	13099	0.0%	0.01	✓			✓
					Compliance	**100%**	**100%**		

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It should be noted, with reference to the Director-General Requirements that the low volumes of heavy vehicles generated by the Enfield ILC indicate that no dedicated infrastructure is required to support a stand-alone road freight corridor for the movement of heavy vehicles from the site.

Appendix A *Model Verification*

A.1 *CALIBRATION IN STUDY AREA*

The statistical measure of the suitability of this model is taken from the UK Design Manual for Roads and Bridges (Volume 12, Section 2, Part 1 Traffic Appraisal of Roads Schemes - Traffic Appraisal in Urban Areas Assignment Validation: Acceptability Guidelines). These criteria are described below:

Statistic 1: GEH Statistic: less than 5 for greater than 85% of cases

Statistic 2:

1) Individual flows within 15% for flows 700-2,700vph

2) Individual flows within 100vph for flows < 700vph } *greater than 85% of cases*

3) Individual flows within 400vph for flows >2,700vph

The GEH Statistic (a form of Chi-squared statistic) is given by the formula:

$$GEH = \sqrt{\frac{(M - C)^2}{(M + C)/2}}$$

Where: GEH is the GEH statistic
M is the modelled flow; and
C is the observed flow.

The results of the calibration process are shown in the tables below for the AM and PM peak.

- **AM Peak Re- Calibration Results – All Vehicles**

Street Name	Location	Direction	Actual Volume	Modelled Volume	GEH Statistic
Boronia Road	E of Hume Highway	Eastbound	474	429	2.12
Boronia Road	E of Hume Highway	Westbound	481	388	4.46
Centenary Drive	S of Barker Road	Northbound	3,597	4,018	6.82
Centenary Drive	S of Barker Road	Southbound	3,127	3,190	1.12
Cosgrove Road	S of Hume Highway	Northbound	531	436	4.32
Cosgrove Road	S of Hume Highway	Southbound	444	452	0.38
Georges River Road	E of Coronation Parade	Eastbound	1,507	1,385	3.21
Georges River Road	E of Coronation Parade	Westbound	1,234	1,137	2.82
Hume Highway	W of Centenary Drive	Northbound	3,791	3,463	5.45
Hume Highway	W of Centenary Drive	Southbound	2,575	2,573	0.04
Hume Highway	E of Cosgrove Road	Eastbound	2,264	2,447	3.77
Hume Highway	E of Cosgrove Road	Westbound	1,780	1,954	4.03
Hume Highway	N of Stacey Street	Northbound	2,804	2,608	3.77
Hume Highway	N of Stacey Street	Southbound	1,684	1,795	2.66
Roberts Road	S of Norfolk Road	Northbound	2,724	2,506	4.26
Roberts Road	S of Norfolk Road	Southbound	2,049	1,892	3.54
Wentworth Street	E of Roberts Road	Northbound	80	73	0.80
Wentworth Street	E of Roberts Road	Southbound	185	239	3.71

- **PM Peak Re- Calibration Results – All Vehicles**

Street Name	Location	Direction	Actual Volume	Modelled Volume	GEH Statistic
Boronia Road	E of Hume Highway	Eastbound	534	495	1.72
Boronia Road	E of Hume Highway	Westbound	492	429	2.94
Centenary Drive	S of Barker Road	Northbound	2,780	3,041	4.84
Centenary Drive	S of Barker Road	Southbound	3,552	3,766	3.54
Cosgrove Road	S of Hume Highway	Northbound	583	507	3.26
Cosgrove Road	S of Hume Highway	Southbound	413	472	2.80
Georges River Road	E of Coronation Parade	Eastbound	1,139	1,051	2.66
Georges River Road	E of Coronation Parade	Westbound	1,484	1,307	4.74
Hume Highway	W of Centenary Drive	Northbound	2,416	2,174	5.05
Hume Highway	W of Centenary Drive	Southbound	3,028	2,972	1.02
Hume Highway	E of Cosgrove Road	Eastbound	1,559	1,721	4.00
Hume Highway	E of Cosgrove Road	Westbound	2,241	2,236	0.11
Hume Highway	N of Stacey Street	Northbound	1,691	1,786	2.28
Hume Highway	N of Stacey Street	Southbound	2,646	2,665	0.37
Roberts Road	S of Norfolk Road	Northbound	2,121	1,937	4.08
Roberts Road	S of Norfolk Road	Southbound	2,512	2,488	0.48
Wentworth Street	E of Roberts Road	Northbound	153	148	0.41
Wentworth Street	E of Roberts Road	Southbound	67	74	0.83

The 2005 base model achieved the following results:

AM Peak Hour

- Statistic 1: The GEH statistic was less than 5 for 89% of cases
- Statistic 2: Individual flow criteria was satisfied in 94% of cases

PM Peak Hour

- Statistic 1: The GEH statistic was less than 5 for 94% of cases
- Statistic 2: Individual flow criteria was satisfied in 100% of cases

Both the AM Peak and PM Peak are consistent with the count data and this level of calibration is acceptable.

In addition to the re-calibration of the total hourly flow during the AM peak period and PM peak period, the heavy vehicle matrix was also re-calibrated within the study area. The results of the heavy vehicle calibration process (modelled vs actual flows) are shown in the tables below for the AM and PM peak periods.

- ***AM Peak Re - Calibration Results – Heavy Vehicles***

Street Name	Location	Direction	Actual Volume	Modelled Volume	GEH Statistic
Boronia Road	E of Hume Highway	Eastbound	73	46	3.50
Boronia Road	E of Hume Highway	Westbound	41	24	2.98
Centenary Drive	S of Barker Road	Northbound	361	355	0.32
Centenary Drive	S of Barker Road	Southbound	337	360	1.23
Cosgrove Road	S of Hume Highway	Northbound	97	54	4.95
Cosgrove Road	S of Hume Highway	Southbound	68	31	5.26
Georges River Road	E of Coronation Parade	Eastbound	91	65	2.94
Georges River Road	E of Coronation Parade	Westbound	48	40	1.21
Hume Highway	W of Centenary Drive	Northbound	306	211	5.91
Hume Highway	W of Centenary Drive	Southbound	198	175	1.68
Hume Highway	E of Cosgrove Road	Eastbound	131	194	4.94
Hume Highway	E of Cosgrove Road	Westbound	73	98	2.70
Hume Highway	N of Stacey Street	Northbound	252	219	2.15
Hume Highway	N of Stacey Street	Southbound	138	141	0.25
Roberts Road	S of Norfolk Road	Northbound	230	268	2.41
Roberts Road	S of Norfolk Road	Southbound	219	217	0.14
Wentworth Street	E of Roberts Road	Northbound	48	39	1.36
Wentworth Street	E of Roberts Road	Southbound	57	58	0.13

- ***PM Peak Re-Calibration Results – Heavy Vehicles***

Street Name	Location	Direction	Actual Volume	Modelled Volume	GEH Statistic
Boronia Road	E of Hume Highway	Eastbound	27	11	3.67
Boronia Road	E of Hume Highway	Westbound	34	27	1.27
Centenary Drive	S of Barker Road	Northbound	238	236	0.13
Centenary Drive	S of Barker Road	Southbound	188	228	2.77
Cosgrove Road	S of Hume Highway	Northbound	41	17	4.46
Cosgrove Road	S of Hume Highway	Southbound	63	39	3.36
Georges River Road	E of Coronation Parade	Eastbound	33	34	0.17
Georges River Road	E of Coronation Parade	Westbound	45	24	3.58
Hume Highway	W of Centenary Drive	Northbound	113	90	2.28
Hume Highway	W of Centenary Drive	Southbound	168	168	0.00
Hume Highway	E of Cosgrove Road	Eastbound	47	68	2.77
Hume Highway	E of Cosgrove Road	Westbound	100	108	0.78
Hume Highway	N of Stacey Street	Northbound	84	119	3.47
Hume Highway	N of Stacey Street	Southbound	179	134	3.60
Roberts Road	S of Norfolk Road	Northbound	147	181	2.65
Roberts Road	S of Norfolk Road	Southbound	170	129	3.35
Wentworth Street	E of Roberts Road	Northbound	10	23	3.20
Wentworth Street	E of Roberts Road	Southbound	10	9	0.32

The 2005 base model achieved the following results for heavy vehicles:

AM Peak Hour

- Statistic 1: The GEH statistic was less than 5 for 89% of cases
- Statistic 2: Individual flow criteria was satisfied in 100% of cases

PM Peak Hour

- Statistic 1: The GEH statistic was less than 5 for 100% of cases
- Statistic 2: Individual flow criteria was satisfied in 100% of cases

Both the AM Peak and PM Peak are consistent with the count data and this level of calibration is acceptable.

A.2 CONSIDERATION OF REGIONAL SCREENLINE DATA

The traffic assessment for the ILC has been focussed on the immediate area of impact of traffic generated from the proposed development. This has been done due to the low peak-period level of traffic generated by the ILC, in comparison with regional traffic, and the ready dissipation of that low volume onto the regional network.

The level of generated traffic from the development is substantially less than can be reasonably identified in a regional network model. Calibration therefore focused on the local area network surrounding the ILC.

Cross-regional calibration is usually required when significant infrastructure or traffic generation is anticipated, neither of which are pertinent to the ILC proposal.

At the request of IHAP, regional screenline data was sought from the Roads and Traffic Authority for 2005 to confirm the goodness-of-fit of the calibrated model to regional traffic volumes. The RTA has advised SPC that this data has not been fully validated and is not available at the time of writing this memorandum.

In this regard, published 2002 screenline data was compared with modelled 2005 traffic volumes to identify regional traffic growth (see tables below). This data is somewhat incomplete, because published data for the M5 and M4 is not available, as these are private motorways and are significant east/west arterials in the ILC region, although not the vicinity. For RTA's Screenlines 1 and a combination of 5 and 7 (see **Figure 1-3**) growth between published 2002 and modelled 2005 was ~2% per year. This is consistent with regional growth expectation in the form of key indicators published by Transport and Population Data Centre[1] which indicated 2% pa growth 1999-2002, with increasing growth of 3% pa 2001-2002.

- ***Screenline 1 Comparison (2002-2005)***

Screenline 1

RTA Count ID	Location	TwoWay Traffic Volumes 2002 AM Count	2005 AM Model	2002 PM Count	2005 PM Model
29142	Australia Avenue W of Homebush Bay Dr	1,842	1,470	1,780	1,368
28001 V	M4 East of Homebush Bay Drive	7,105	7,038	6,504	6,892
27143 V	Parramatta Rd W of Centenary Dr	2,997	4,247	2,812	3,500
28032	Arthur St W of Centenary Dr	1,930	2,245	1,865	2,314
43224	Brunker Ave W of Hume Hwy	1,488	3,911	1,438	3,236
43239 V	Hume Hwy S of Boronia Rd	4,920	4,403	4,557	4,451
43086	Wattle Street E of Stacey St	2,223	2,530	2,149	2,258
43221	South Terrace W of Punchbowl Rd	1,278	1,901	1,236	2,037
43084	Stacey St N of Canterbury Rd	1,279	881	1,236	783
43240 V	Canterbury Rd E of Fairford Rd	3,915	3,143	4,120	3,533
43032 V	Henry Lawson Drive at Salt Pan Creek	3,801	3,152	3,832	2,946
		32,779	**34,921**	**31,529**	**33,318**
			2002-2005		2002-2005
			2.2%pa		1.9%pa

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[1] "2002 Household Travel Survey Executive Summary – 2004 Release", TPDC 2004/02, Department of Infrastructure, Planning and Natural Resources

- ***Screenline 5 & 7 Comparison***

Screenline 5 & 7 RTA Count ID	Location	TwoWay Traffic Volumes 2002 AM Count	2005 AM Model	2002 PM Count	2005 PM Model
20067 V	City West Link at Hawthorne Canal	3,251	3,733	4,302	4,143
20035	Marion Street at Hawthorne Canal	1,239	1,110	1,389	1,332
20012 V	Parramatta Rd W of Old Canterbury Rd	4,415	5,079	4,760	4,984
19193	Longport Street W of Old Canterbury Rd	697	2,045	781	2,253
19192	Old Canterbury Rd E of Edward St	1,520	1,447	1,704	2,646
19189 V	New Canterbury Road at railway	2,083	2,393	2,096	2,091
24212	Wardell Ave at Cooks River	1,534	1,474	1,491	1,470
19041	Illawarra Rd at Cooks River	1,180	865	1,147	984
24210	Bayview Ave at Cooks River	1,182	255	1,149	220
23001 V	Princes Highway at Cooks River	5,006	5,012	5,027	5,439
23067 V	Marsh Street at Cooks River	4,190	5,130	3,706	4,667
23002 V	General Holmes Drive at Airport Tunnel	11,590	11,816	11,169	11,651
		37,886	**40,359**	**38,721**	**41,880**
			2.2% pa		2.7% pa

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Of additional imperative is assessment of changes in network and landuse profile that would affect the validity of the base model. While the model relates to 1999 forecasts, it does reflect updated network infrastructure, and the landuse profiles in the subregion have not changed.

As such, it is contended that:

- the calibrated model is appropriate for the local impact assessment;
- given that the scale of traffic generated from the development is small in comparison with surrounding traffic activity, the critical calibration endeavour must focus on local issues, and cross-regional traffic calibration is a lesser concern;
- published screenline data for 2002 is incomplete as it does not include major cross regional links in the M4, M5 and M5 east; and
- regional traffic growth embodied in the calibrated model is entirely consistent with anticipated regional growth.

…ooOoo…

Appendix G Construction Phase PM_{10} Impacts

TECHNICAL MEMORANDUM

Matt Davies

10 March 2006

This memo describes the results of PM_{10} modelling of the construction phase impacts. The result show PM_{10} impacts for construction scenarios 1 and 2 and key results are shown for receptors R1, R2 located to the south-east of the ILC and R5 which is located to the north-west.

The results show time traces of 24-hour PM_{10} impacts including both background PM_{10} concentrations and impact levels added to the background.

The modelling scenarios are the same as those described in the EA and assume a wind speed restriction of 5 m/s, however, the wind direction restriction of 210 – 340 degrees has not been applied to these specific results, in order to show the key wind direction and times of the year when most significant impacts are likely to occur.

The results for construction scenario 1 are shown in **Attachment A** and results for scenario 2 are shown in **Attachment B**.

With respect to both construction scenarios it can be seen that for receptors R1 and R2 located to the south-east, impacts which cause exceedance of the 50 $\mu g/m^3$ criteria, generally occur between the months of May and December. This is considered to be associated with west and north-west winds which prevail during this time of the year.

Alternatively at receptor R5 located to the north-west the greatest impacts occur during the months of January to April, corresponding to the prevailing south-east winds at this time of the year.

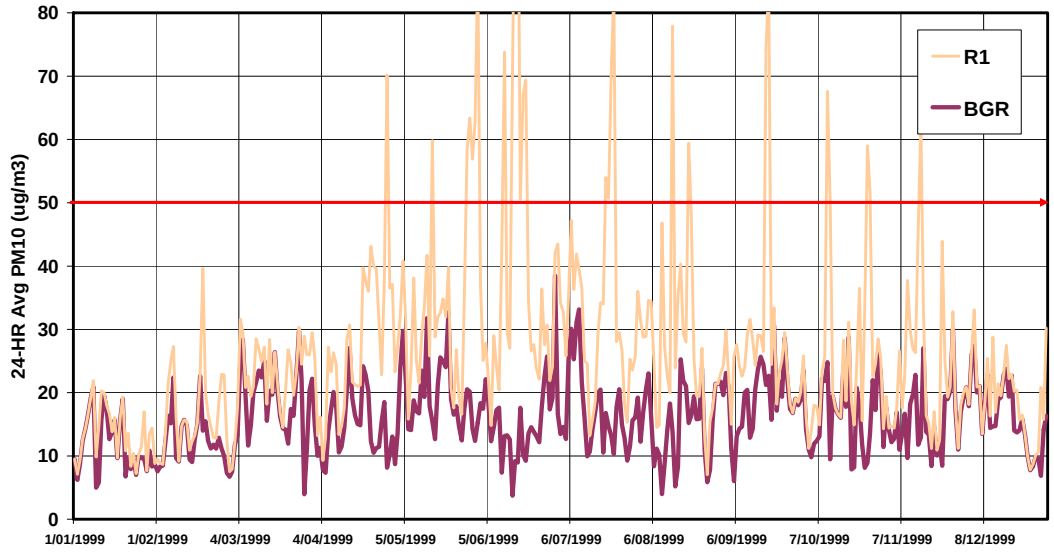
It can be observed from the data it is really only receptor R1 that sees more than a few exceedances of the relevant criteria. At receptor R2 which is only a marginal distance away from the ILC site, there are only isolated exceedances of the criteria predicted to occur.

In terms of managing dust impacts associated with construction, it is probable that the scheduling of specific works at various times of the year will assist in managing offsite impacts. Specifically avoiding bulk earthworks on the southern end of the site during the period May to December would mitigate the exceedances presented in the assessment, as would avoiding bulk earthworks at the northern end of the site during the period January to April, however, this is considered less important.

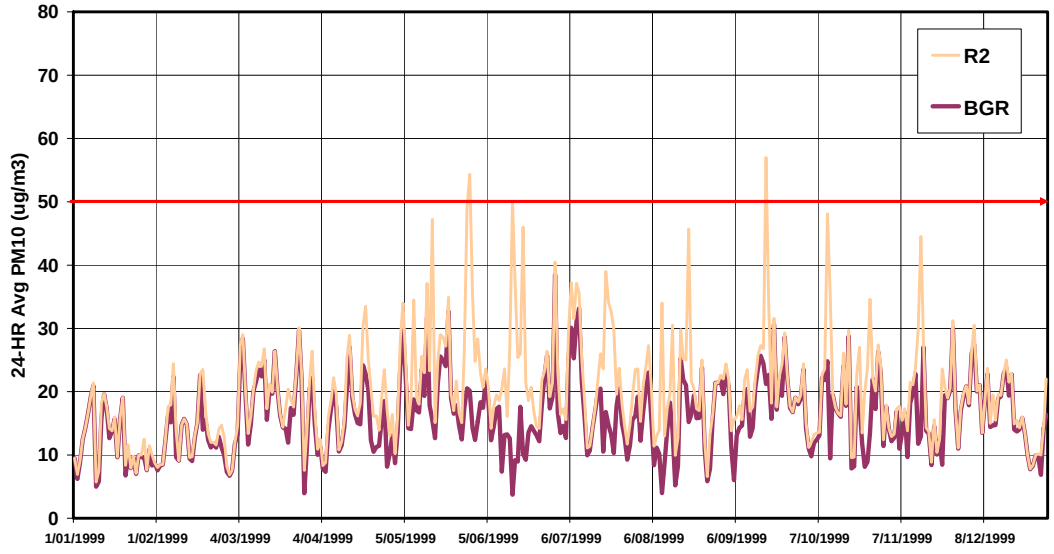
Attachment A - Construction Scenario 1

Plots show background PM_{10} ("BGR" - brown) and background+ILC PM_{10} (light brown).

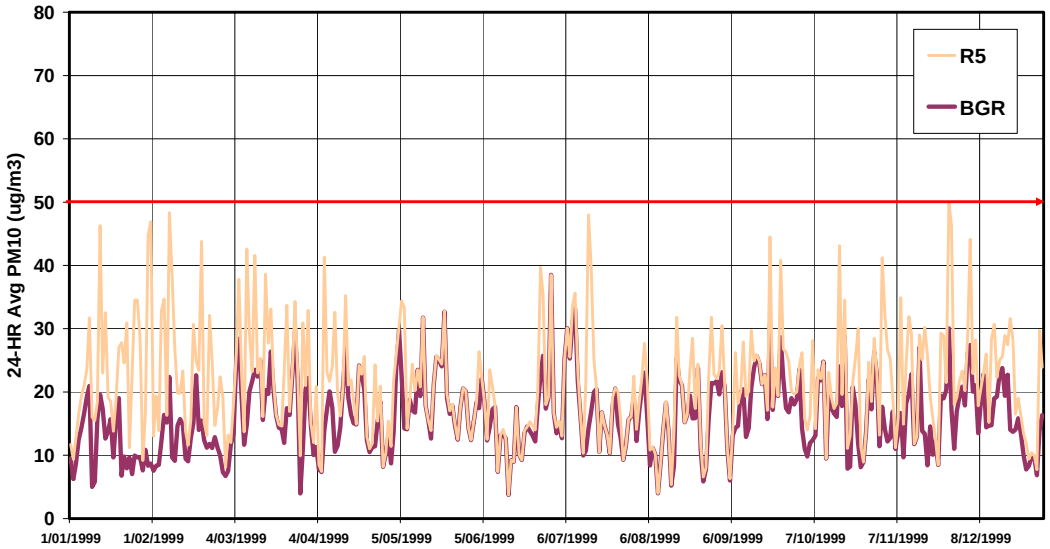
- **Figure A-1 24-hour average PM_{10} – Discrete Receptor R1**



- **Figure A-2 24-hour average PM_{10} – Discrete Receptor R2**



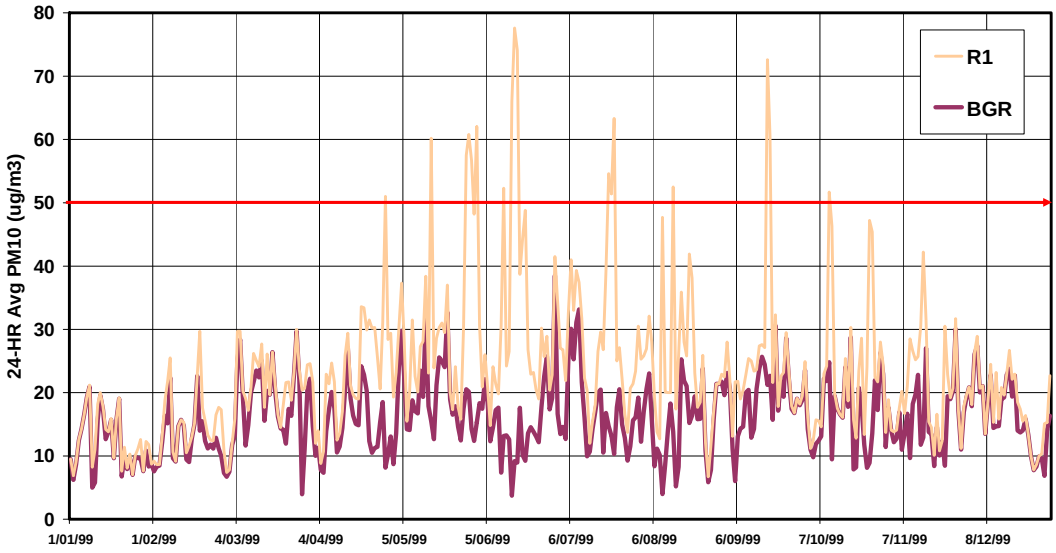
- **Figure A-3 24-hour average PM_{10} – Discrete Receptor R5**



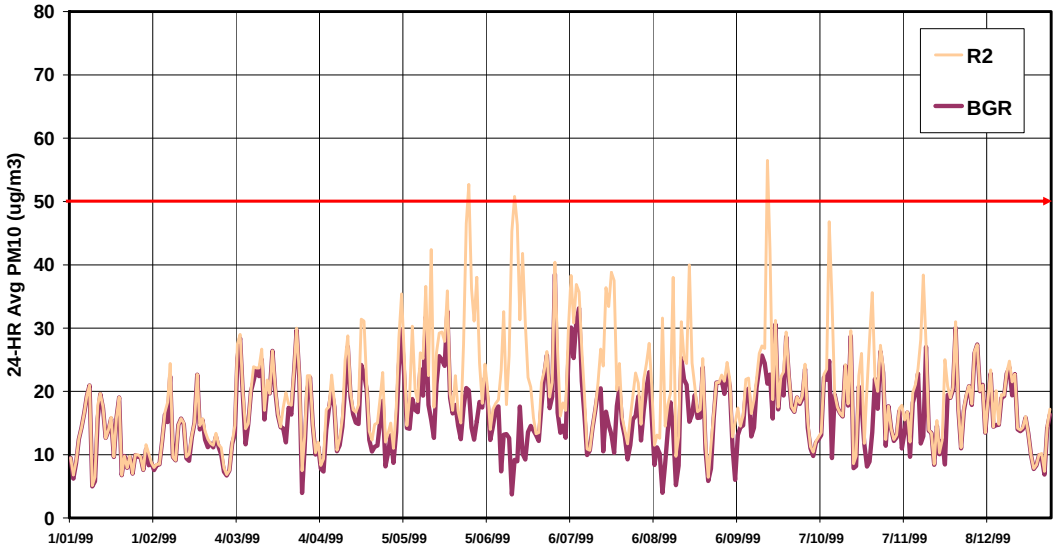
Attachment B - Construction Scenario 2

Plots show background PM_{10} ("BGR" - brown) and background+ILC PM_{10} (light brown).

- **Figure B-1 24-hour average PM_{10} – Discrete Receptor R1**



- **Figure B-2 24-hour average PM_{10} – Discrete Receptor R2**



- **Figure B-3 24-hour average PM_{10} – Discrete Receptor R5**