

30 November 2016

Planning Services
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

ATTN: Director – Social and Other Infrastructure Assessments

RE: Liverpool City Council submission to Moorebank Precinct West - Stage 2 Proposal (SSD 7709)

Please find enclosed Council's submission for the above proposal at Moorebank. The document includes Council's submission prepared by Cardno, which incorporates Council Officer's comments and expert consultant review of this application.

Council notes that many of the impacts previously identified in Council's review of the Concept Approval have not yet been adequately assessed and mitigated to an acceptable level.

Key concerns and issues raised in the submission are as follows:

- **Traffic Impacts** - The proposed development would be expected to generate significant traffic volumes. Council has consistently contended that the cumulative impact of the terminal developments needs to be assessed and the required upgrades committed and funded before additional developments are approved. Council again strongly requests that the traffic investigation and associated infrastructure upgrades and funding commitments are confirmed before approvals are granted.
- **Noise and Air Quality** - Noise and Air Quality impacts on human health during both construction and operation are likely to be greater than identified in the EIS due to the traffic assumptions used. Furthermore, the EIS cannot be adequately assessed without the release of RMS modelling.
- **Biodiversity Impacts** - Biodiversity is likely to be heavily impacted by the proposal, with a number of deficiencies in the current assessment that reduce the extent of impacts identified and costs associated with offsetting impacts. The EPA (with support and commitment from State and Federal Government agencies) is believed to be the most appropriate regulatory authority for the proposed development and associated activities should approval be granted. Council has previously advised of concerns about the capacity regarding sourcing and implications that would be associated with the regulation of facility of this size and operational capacity.

Council considers that assessment of the MPW Stage 2 should be deferred until the outcome of the modification of the Stage 1 Concept Approval SSD_5066 under Section 96 of the EP&A Act and until the issues raised in the attached submission are adequately addressed.

Should you require any further information on this matter, please contact Ash Chand, Executive Planner, on 9821 9285.

Yours sincerely



Toni Averay
Director Planning and Growth

Attachment: SIMTA Intermodal Terminal Project – Moorebank Precinct West Stage 2 Peer Review