Executive Summary

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This Response to Submissions Report (incorporating proposed amendments to the development and associated impact assessment) has been prepared in response to the issues raised in community and stakeholder submissions received during the public exhibition of the Moorebank Intermodal Terminal (IMT) Project (the Project) Environmental Impact Statement (EIS).

This Response to Submissions Report (this report) relates to the Project approvals sought under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and development consent under the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act).

Overview of the Proposal

Forecast growth in international and interstate freight movements through Sydney and increased industrial and commercial development in west and south-west Sydney have prompted government and industry to consider new strategies for alleviating constraints on freight. Insufficient intermodal rail freight capacity is recognised as a key barrier to the future development of Sydney and improvements in national productivity.

The Project involves the development of intermodal freight terminal facilities at Moorebank, in south-west Sydney that facilitates the reduction of road traffic along key road freight corridors supporting the movement of freight by train. This is consistent with NSW Government objectives towards increasing the mode share from trucks to trains.

Key features of the development as presented in the EIS (at Full Build in 2030) include the following:

- *An import/export (IMEX) freight terminal* designed with a maximum capacity of 1.05 million twenty-foot equivalent units (TEU) a year (525,000 TEU inbound and 525,000 TEU outbound) servicing international IMEX freight movement between Port Botany and the Project site.
- *An interstate freight terminal* designed to handle up to 500,000 TEU a year (250,000 TEU inbound and 250,000 TEU outbound) of interstate freight, servicing trains travelling to, from and between Sydney and regional and interstate destinations.
- *Warehousing facilities* with capacity for up to 300,000 square metres (sq. m) of gross floor area to provide an interface between the IMEX and interstate terminals and commercial users of the facilities such as freight forwarders, logistics facilities and retail distribution centres.
- *A rail access connection (rail link) between the main IMT site and the Southern Sydney Freight Line (SSFL)* via a bridge crossing the Georges River to the west of the main IMT site.
- *Establishment of a conservation area* to maintain and enhance the riparian vegetation between the Georges River and the 1% annual exceedance probability (AEP) flood level.
- *An upgrade of Moorebank Avenue* including widening of the road to a four-lane carriageway between the M5 Motorway and the East Hills Railway Line, upgrades to intersections to accommodate the widening and additional traffic, and traffic control measures.

The Project is proposed to be developed on an area of land owned by the Australian Government and currently occupied by the Department of Defence (Defence). The site is adjacent to the SSFL, the East Hills Rail Line and the M5 Motorway.

The Moorebank Intermodal Company (MIC) is currently seeking approval for the proposal 'concept' (i.e. the broad parameters of the Project to operate at maximum capacity of 1.55 million TEU) to satisfy both:

- a staged State significant development (SSD) consent under the NSW EP&A Act (including a Stage 1 development consent for Early Works); and
- the requirements of the Commonwealth EPBC Act in relation to impacts of the proposed action on matters protected under the Act (which, in the case of this Project, comprise listed threatened species and communities) and impacts on the environment by a Commonwealth agency.

The approval processes under the EPBC Act and the EP&A Act are being undertaken in parallel and the EIS addressed both the Commonwealth's EIS guidelines as well as the Secretary for NSW Department of Planning and Environment's (DP&E) Environmental Assessment Requirements (SEARs) for the Project.

The development of the Project is proposed to be phased, with an initial IMEX terminal and warehousing facilities planned to commence operations around 2018 (subject to approval). Subsequent development of interstate IMT facilities, followed by 'ramp-up' of IMEX capacity and warehousing is then expected to occur in line with the expected freight demand.

Future Stage 2 SSD approval applications will be linked to the proposed development phases presented below and may be subject to further change in light of changing economic conditions in future years. As such, the proposed phasing is a best estimate for the purposes of assessing environmental impacts at key stages of development. Each SSD stage of development will be subject to its own detailed EIS which will provide an opportunity for the (slightly revised compared to the EIS) Project stages and timing to be determined in detail. A summary of the revised phasing comprises the following:

1. Early Works (2015), including Rehabilitation Works – subject to the current concept approval application.
2. Phase A – construction of 250,000 TEU IMEX terminal, 100,000 sq. m of warehousing and construction of the southern rail link (in 2015–2016).
3. Phase B – the phase would commence with the operation of a 250,000 TEU IMEX terminal and 100,000 sq. m of warehousing, as well as the construction of a 250,000 TEU interstate rail terminal, which would become operational in mid-2019. Construction of an additional 250,000 TEU IMEX terminal would occur in mid-late 2020.
4. Phase C – the phase would commence with operation of a 500,000 TEU IMEX terminal, 100,000 TEU warehousing and a 250,000 TEU interstate terminal. Additional construction activities during Phase C (which would become operational once completed) comprise the construction of 150,000 sq. m of warehousing and a 250,000 TEU IMEX (mid 2022 to end 2023 approx.), construction of an additional 255,000 TEU IMEX (in 2027); and construction of an additional 250,000 TEU interstate capacity and 50,000 sq. m of warehousing (in 2029).
5. Full Build – operation of a 1.05 million TEU IMEX terminal and a 500,000 TEU interstate terminal and 300,000 sq. m of warehousing (in 2030).

Overview of amendments to the proposal

Prior to the EIS exhibition, MIC developed the Moorebank IMT proposal as a stand-alone project. The Sydney Intermodal Terminal Alliance (SIMTA) proposal for an intermodal terminal on the site immediately east of the Project site was also being pursued separately, with its own planning and environmental approvals being sought. However, since the exhibition of the EIS, an agreement has been reached between MIC and SIMTA for an integrated precinct-wide intermodal facility and associated warehousing across both the MIC and SIMTA sites. This has resulted in a change in concept layout on the Moorebank intermodal site and the selection of the southern rail access option as the preferred rail connection from the SSFL to the site.

Under this agreement MIC will continue with its existing application for Stage 1 SSD concept approval (incorporating early works) for the Moorebank IMT site and SIMTA will be responsible for obtaining all other approvals required under the EP&A Act, to build all stages of the Project.

SIMTA has received approval under the EPBC Act for the construction and operation of an IMT comprising a one million TEU IMEX facility and 300,000 sq. m of warehousing. SIMTA has also received concept approval from the Planning Assessment Commission (PAC) under the (then) Part 3A of the NSW EP&A Act for the development of an IMT. In approving the development however, the PAC granted concept approval only for a 250,000 TEU IMEX facility until the local road infrastructure is upgraded to support increased capacity. The PAC stipulated that' subject to more detailed traffic assessment, an ultimate 500,000 TEU capacity could be provided and that this should be adequate to 'meet the Government's objectives for rail freight from Port Botany well into the future'. This is less than the one million TEU that was sought by SIMTA. The PAC approved the 300,000 sq. m of warehousing proposed.

SIMTA is now in the process of obtaining development approval (DA) to construct and operate Stage 1 of its development being:

- a 250,000 TEU IMEX facility; and
- a rail connection to the SSFL at the southern end of the Moorebank site.

The agreement between MIC and SIMTA is subject to certain contractual conditions between the two parties. These conditions include that:

- project approval be obtained by SIMTA for the IMEX terminal on the SIMTA site; and
- a staged DA be obtained by MIC for terminal development on the Moorebank site.

The agreement between MIC and SIMTA considers the planning pathway if the conditions of the agreement are met. The planning pathway would incorporate the current approval that has already been obtained by SIMTA, and would include the following milestones:

- SIMTA obtains Stage 1 DA development approval for its site (current);
- MIC obtains staged DA - including Stage 1 Early Works for its site (current); and
- SIMTA obtains all subsequent DAs for each stage of the precinct development including any necessary modifications to approval conditions granted to both sites to secure an integrated 1.55 million TEU single IMT.

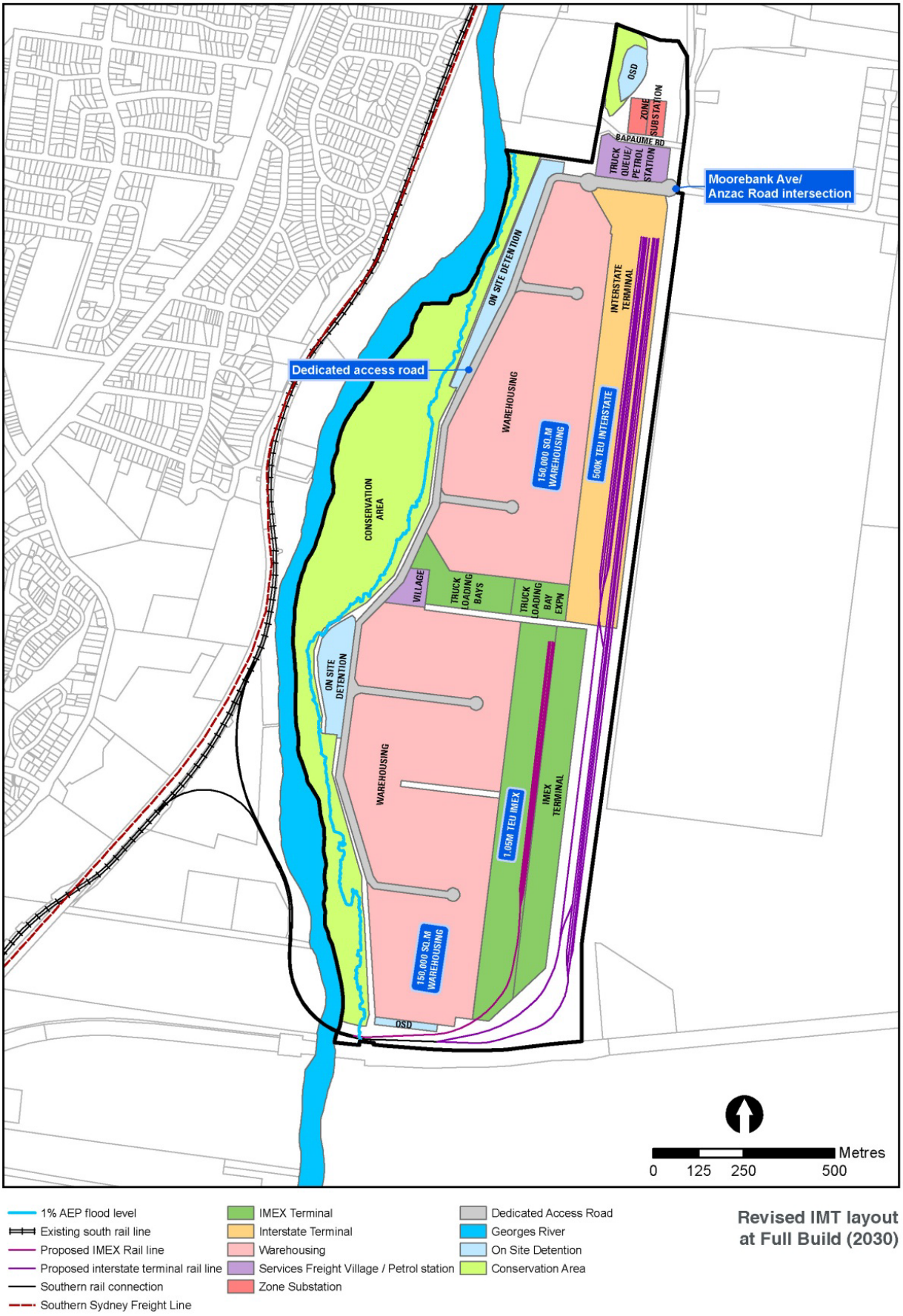

Figure ES.1 Project layout for revised development

Elements of the Project layout and built form that have changed

Amendments to the Project layout and built form are shown on Figure ES.1 and comprise:

- changes to the layout and operation of the IMT, including the location of the warehousing, working tracks and storage tracks, IMT freight village precinct, IMEX and interstate equipment storage and repair area and detention ponds;
- confirmation that the southern rail access into the site will be required (the EIS sought flexibility to build either a southern, central or northern rail access into the site from the SSFL);
- changes to access and circulation including heavy and light vehicle access to the facility via the Moorebank Avenue and Anzac Road intersection, along a dedicated road at the north and along the western boundary of the Project site;
- changes to the upgrade of Moorebank Avenue, which will be upgraded between Anzac Road and the M5 Motorway into a four-lane dual carriageway. No upgrades are proposed south of the Anzac Road intersection since traffic from the terminal will not use the southern section of Moorebank Avenue; and
- an increase in the size of the conservation area.

Figure ES.2 shows the components of the EIS and the proposed amendments to the development and illustrates how they have changed.

The amendments are being proposed to facilitate the integration of the Moorebank and SIMTA site operations, consistent with the agreement between MIC and SIMTA to develop the Project across a single site.

KEY PROJECT COMPONENTS	EIS	REVISED PROJECT
IMEX FREIGHT TERMINAL	Designed to handle 1.05 million TEU per year of IMEX containerised freight. Located in the centre of the Project site.	Designed to handle 1.05 million TEU per year of IMEX containerised freight. Located in the southern section of the Project site, adjacent to Moorebank Avenue.
INTERSTATE TERMINAL	Designed to handle up to 500,000 TEU per year of interstate containerised freight. Located in the centre of the Project site.	Designed to handle up to 500,000 TEU per year of interstate containerised freight. Located along the eastern section of the Project site, adjacent to Moorebank Avenue.
WAREHOUSE FACILITIES	Capacity of up to 300,000 sq m. Located on the eastern boundary of the Project site, adjacent to Moorebank Avenue.	Capacity of up to 300,000 sq m. Located along the western boundary of the Project site, adjacent to a dedicated access road.
RAIL ACCESS AND LAYOUTS	Project connected to the Southern Sydney Freight Line (SSFL) via a new rail access. Three rail access options assessed in EIS (northern, central and southern rail access).	Project connected to the Southern Sydney Freight Line (SSFL) via a new southern access from the SSFL. Northern and central rail access options not considered further.
VEHICLE ACCESS	Vehicles to access the Project site from Moorebank Avenue via the M5 Motorway. Modification to the M5 Motorway intersection, widening and upgrade of Moorebank Avenue to East Hills Railway Line. Upgrade of Anzac Road and relocation and upgrade of Bapaume Road.	Vehicles to access the Project site from a new Moorebank Avenue/Anzac Road intersection via the M5 Motorway. Modification to the M5 Motorway intersection, widening and upgrade of Moorebank Avenue to the new intersection only.
INTERNAL ROAD LAYOUT	Vehicles to access IMEX, IMT terminals and warehouses via access points off the upgraded Moorebank Avenue.	Vehicles to access IMEX, IMT terminals and warehouses via a dedicated access road (open to the public), leading from the new Moorebank Avenue/Anzac Road intersection, located on the western boundary of the site adjacent to the conservation area.
CONSERVATION AREA	Located along Georges River on the western boundary of the Project site.	Located along Georges River on the western boundary of the Project site.
ON-SITE STORMWATER DETENTION BASIN	Multiple detention basins along western edge of development area. Detention basin locations differ for each rail access option.	Multiple detention basins along western edge of development area. Currently four detention basins proposed; two adjacent (western site) to dedicated access road, one in northern corner (adjacent to ABB land) and one in the southern end of the site. Final locations will be determined during detailed design.

Figure ES.2 Comparison of the key project components of the EIS and revised

A detailed description and assessment of the amendments are provided in Chapter 7 – *Proposed amendments to the development* of this report. The impacts associated with the amendments are assessed in section 7.9 and management and related mitigation measures are detailed in Chapter 9 – *Revised environmental management measures* of this report.

Overview of submissions received

The EIS for the Project was placed on public exhibition between 8 October and 8 December 2014. During this period government agencies, local councils, key business/infrastructure stakeholders and the community were invited to make written submissions on the Project to NSW DP&E.

A total of 1,793 submissions were received during the EIS exhibition period. Of these submissions, 14 were provided by government agencies and local councils, with the remaining 1,779 provided by community members.

The content of each community submission was reviewed and categorised according to key issues (e.g. traffic, noise, air quality) and sub-issues (e.g. traffic impacts on the M5 Motorway). Due to the relatively large number and diversity of issues raised in community submissions, these matters raised in submissions were grouped based on their assigned key issue and sub-issue categories. This means that while the exact wording of the submission may not be captured in this Response to Submissions Report, the intent and the issues raised have been identified. Details of the issues raised and MIC's response are provided in Chapter 6 – *Response to community submissions* of this report.

Fourteen submissions were received from government agencies and local councils. These included submissions from Liverpool City Council (LCC), Campbelltown City Council (CCC), Hurstville City Council (HCC), Fairfield City Council (FCC), Bankstown City Council (BCC), Transport for NSW (TfNSW), Office of Environment and Heritage (OEH), Environment Protection Authority, Fire and Rescue NSW, NSW Rural Fire Service, Sydney Catchment Authority, NSW Department of Primary Industries (including comments from NSW Office of Water and Fisheries NSW), NSW Health and NSW Ports. Details of the issues raised and MIC's responses are provided in Chapter 5 – *Response to government agency submissions* of this report.

Following conclusion of the public exhibition period, MIC prepared this report to address the issues raised through the submissions and to document a number of amendments/variations to the proposed development since the exhibition of the EIS.

Assessment of submissions

The community and stakeholder submissions raised a number of key issues, with most submissions raising multiple issues. The top five issues raised by the community were:

- Project site alternatives and justification;
- traffic, transport and access;
- noise and vibration impacts;
- local and regional air quality; and
- human health risks and impacts.

Justification for a 1.55 million TEU throughput capacity at the site (given the PAC decision to cap the SIMTA project initially at 250,000 TEU), relationship to the SIMTA approval and cumulative impact considerations were also raised by submitters and are key issues to be considered.

The agreement with SIMTA for a single integrated terminal and the extensive assessment of the cumulative impacts of various stages of construction and operation are presented further in this report.

Project site alternative considerations and justification

The Project site was selected for its good access to existing major freight and rail corridors (SSFL, M5 Motorway, near the M7 Motorway and Hume Highway) and its central location relative to major freight markets in the west and south west of Sydney. The size of the site was also a significant factor in its selection, with the requirement to accommodate interstate trains (which can be up to 1,800 m long) and the need for the site to be large enough to handle the number of containers expected (a total throughput capacity of 1.55 million TEU a year, including up to 1.05 million TEU a year of IMEX). The site also has space for onsite warehousing, which increases the efficiency of the freight service offered and therefore increases the attractiveness of the terminal and its potential to get more freight onto the rail network.

Currently only 14% of freight to and from Port Botany travels by rail. To achieve NSW Government rail share target of 28% beyond 2020, the NSW government has begun to invest in network upgrades and operational improvements at the port-rail interface and upgraded the rail connection to the port. The NSW rail mode share target will be most efficiently achieved by maximising the efficient use of existing intermodal terminals and making an economically efficient investment in additional intermodal capacity in locations that are attractive to the freight market to fill the shortfall between the future capacity of existing terminals and the capacity needed to handle 28% of Port Botany's total throughput. The Moorebank IMT project is therefore imperative to supporting the modal shift which will ultimately improve the state and national productivity and drive economic growth.

A number of submissions suggested the demand could be accommodated within Sydney's existing IMT facilities; however, IMTs serve a defined geographic catchment and there is clear demand for Moorebank from a catchment area that is different to that served by existing IMTs. Also, Sydney's estimated total future IMEX intermodal capacity at existing terminals is not sufficient to meet government rail freight targets or expected rail freight demand at Port Botany. This includes the potential future capacity provided by the Yennora, MIST (Minto) and Villawood terminals approved capacity at the Enfield IMT and the recently announced new IMEX capacity at Chullora.

For the NSW rail freight target of 28% to be met, almost 800,000 TEU would be transported to and from Port Botany by rail by 2020, increasing to almost 1.18 million TEU by 2030 and to 1.64 million TEU by 2040. Under a conservative set of assumptions, the shortfall in IMEX intermodal capacity needed to achieve this target would be around 415,000 TEU in 2020. The proposed Stage 1 of the precinct (i.e. 250,000 TEU capacity) would partially satisfy this shortfall. By 2030, the shortfall would be a little over 530,000 TEU and by 2040, it would be around 810,000 TEU. Under a less conservative scenario, the shortfall would be around 1.3 million TEU in 2030 and 1.7 million TEU in 2040. Additional capacity therefore will be required (on top of the 1.05 million TEU Moorebank IMEX terminal) to maintain the 28% rail share target, possibly before 2030. Further capacity will be required if a rail freight target of 40% is pursued, consistent with the NSW Freight Infrastructure Advisory Board recommendation in 2005. If this occurs, the 1.05 million TEU IMEX terminal will be needed at Moorebank soon after 2030, under conservative assumptions, and well before 2030 under less conservative forecasts.

No other known site in Sydney has the same unique characteristics to efficiently accommodate the type of activities being proposed. The availability of the site for development represents a once-in-a-generation opportunity for a transformational freight infrastructure project. Alternative IMTs would be significantly less economically efficient than the Moorebank IMT and not practically achievable in the timeframes required. In particular:

- There is no land set aside for an IMT at Eastern Creek and a new freight rail line to the area would be needed with substantial investment implications.

- Land would also be required for an IMT at Badgerys Creek as the new airport site is unlikely to have spare space for this purpose. A new freight rail line would also need to be constructed in addition to the planned passenger line. It would not be practical for freight trains to share the planned passenger line to the new airport since passenger trains receive priority on the passenger network, which would undermine the efficiency and reliability of a rail freight service via Badgerys Creek.

- Even if land was available at Eastern Creek or Badgerys Creek, the planning and environmental approval process to assess the sites' suitability from an environment, social and economic perspective can take years. Given the demand for intermodal facilities in western Sydney the Moorebank IMT site is considered the most appropriate to service the current demand.

Given the clear suitability of the Project site for an IMT and the lack of economically efficient alternatives, it would be inappropriate and mostly inefficient to use the site for an alternative purpose (e.g. residential or commercial), as these land uses would have greater impacts on the local environment and community. For example, during peak hours:

- residential development would generate up to 25 times more traffic than an IMT; and

- a business park would generate up to three times more traffic than an IMT.

The comprehensive site assessment undertaken in the EIS conclusively demonstrated the suitability of the proposed site for the proposed intermodal activities - the essential requirement for decision making.

Justification of 1.55 million TEU

The Moorebank precinct needs to be developed to a total intermodal capacity of 1.55 million TEU, comprising 1.05 million TEU in IMEX capacity and 500,000 TEU in interstate freight capacity for the following reasons:

- To achieve the NSW Government rail share target beyond 2020. The current NSW 28% rail mode share target will be most effectively achieved by maximising the efficient use of existing IMTs and by investing in additional intermodal capacity in locations that are attractive to the freight market. These measures would fill the shortfall between the future capacity of existing terminals and the capacity needed to handle 28% of Port Botany's total throughput.

- No other site has been identified that is practicably feasible in the timeframe required and able to deliver the same operational efficiency (including the efficiency benefit of competition between terminal users under the terminal open access arrangement). Therefore, only the Moorebank precinct creates an opportunity to increase Sydney metropolitan container movements by rail.

- The full IMEX capacity of 1.05 million TEU will be needed if the rail mode share from Port Botany is permitted to grow in line with demand, or if the NSW Government were to pursue a higher target (e.g. 40%, as recommended by the Freight Infrastructure Advisory Board) beyond 2020 to enable the Port to continue to grow. A cap of 500,000 TEU on IMEX throughput would:

    > limit the ability of importers and exporters to choose the most efficient freight transport mode for their needs;

    > reduce the efficiency of planned investment in intermodal capacity at Moorebank, requiring further investment before it is economically efficient, and potentially discouraging investment in intermodal capacity;

    > be inconsistent with NSW and Commonwealth Government objectives to increase freight transfers by rail to reduce reliance on the road network, enabling continued growth in Port Botany throughput and encourage productivity growth; and

> only be warranted if the environmental impacts beyond the cap could not be managed, which other parts of this report, and the EIS, demonstrate is not the case.

- The Moorebank precinct also needs to provide 500,000 TEU of interstate capacity (i.e. in addition to the 1.05 million TEU of IMEX capacity). The Commonwealth Government has been investing heavily in the freight rail network to increase its reliability and transit times. A network of large, modern intermodal facilities, including at Moorebank is required to complement this investment and encourage more interstate freight to travel by rail. An improved interstate rail freight network would compete on cost and reliability with road, thereby encouraging more interstate freight to travel by rail.

- An assessment of the cumulative impacts of the Moorebank precinct on the road network, notes there are a number of intersections that, as a result of background traffic growth will operate at an unacceptable level of service. As such, a series of intersection mitigation measures have been presented that demonstrate that, providing the treatments are undertaken, a precinct wide total of 1.55 million TEU as well as 600,000 sq. m of warehousing can be accommodated for all assessed cumulative scenarios.

- The interstate freight rail network has adequate capacity for the 500,000 TEU of interstate freight planned for the Moorebank precinct. An assessment of the freight rail line between Port Botany and Moorebank found that an upgrade (construction of two new passing loops) is needed to enable it to handle the 1.05 million TEU of IMEX freight planned for Moorebank, on top of demand from other users. ARTC is already planning these upgrades, which are considered practically and economically feasible and will be required by around 2020.

Response to Project specific impacts

Many community submissions raised concerns relating to human health impacts (specifically noise, sleep disturbance, wheel squeal, air quality impacts and diesel fumes/emissions) and traffic and transport (specifically impacts on the local roads and major arterials and the associated social, environmental and economic impacts). Our detailed response to community submissions is presented in Chapter 6 – *Response to community submissions* of this report.

The EIS demonstrates that the IMT will have some impacts on the local community and environment. These impacts will be addressed through a raft of mitigation measures (e.g. local intersection upgrades, noise walls and locomotive standards to reduce noise and diesel emissions). The residual impact on the local community and environment – accounting for mitigation measures – will be small and manageable within established regulatory requirements and criteria. For example, the EIS and Response to Submissions Report demonstrate that:

- the concentration of air borne pollutants in the area will be well within air quality guidelines;

- there will be no measurable impact of the terminal on human health;

- the performance of local intersections will be maintained at the level that would be experienced in the future without the IMT; and

- noise from the IMT and its rail connection will be within government guidelines.

MIC has also been working with the NSW Government to assist its decision making on some major road upgrades that will be needed in the area, regardless of whether the IMT proceeds. These road upgrades are needed to handle growth in background traffic, but would also benefit the IMT. These possible road upgrades were identified in the 2014 NSW State Infrastructure Strategy and are currently being considered by the NSW Government for implementation.

Assessment of amendments

To determine the impacts associated with the changes to the concept design, a scoping exercise was conducted against the findings and conclusions of the impact assessment presented in the EIS. This qualitative exercise determined that the proposed amendments to the development only affected a small number of studies. A summary of the revised impact assessments are:

- Biodiversity impacts – Changes to the Project footprint, specifically the alignment and width of the southern rail access corridor, required a revised assessment of the Project's impacts on biodiversity and the biodiversity offset strategy. The revised assessment also included some minor changes in the quantification of credits generated from the credit calculator which changed the requirement for securing offsite offsets for some species. MIC is committed to undertaking all reasonable steps to secure the matching ecosystem credits and provide an offset package that meets the quantum of the offset requirement. The Project is being assessed under the NSW Government Framework for Biodiversity Assessment calculator.

- Visual – The greatest visual impact of the Project will be on the public parks (Leacock and Carroll Parks in Casula) and associated residential properties that are situated on the elevated topography sloping west from the Georges River. These will have clear views over the site and the taller project elements such as lighting towers and rail mounted gantry cranes. Overall, when compared to the EIS layout, the visual impacts are consistent, recognising that the southern rail access option is the favourable option from a visual impact perspective.

- Traffic – The changed site layout changes the traffic impacts on the surrounding road network. The changes in Project development phasing have also resulted in amendments to the 'ramp up' of traffic generation associated with the revised conversion factors between site uses/activities and trip generation. Adopting the truck generation rates used by SIMTA in its traffic studies (undertaken for its EIS) has resulted in modifications to some of the underlying assumptions about the rates of traffic generation, generally resulting in lower traffic generation rates. Traffic impacts associated with the amendments include the following:

  > A requirement to upgrade Moorebank Avenue north of Anzac Road, and the upgrading of the Anzac Road intersection to a major signalised intersection. This location would be the site entry point for all vehicles, with separation of light and heavy vehicles occurring within the site.

  > For the key intersections, while the traffic impacts at 2030 are slightly worse relative to the predictions made in the EIS, the analysis continues to show that by 2030, all intersections will have experienced a reduced level of service as a result of background traffic growth. A number of intersections will have deteriorated to an unacceptable level of service (Level D or below) without mitigation, due to background traffic alone.

  > Mitigation measures in the form of intersection treatments are proposed to ensure the intersections' performance is returned to 'base level' at any point in time i.e. the performance of an intersection remains no worse than under background (without Moorebank) conditions.

  > Table ES.1 below identifies the treatments that would be required, and by what date, for affected intersections. Mitigation treatments would only be applied if an intersection is operating at level of Service (LoS) E or worse as a result of the Project traffic above the background growth and cumulative impacts by others. Treatments would not be recommended where the resulting LoS of D or above is achieved, even where performance has deteriorated as a result of the Project.

> Indicative timing of these upgrades is provided in Table ES.1, based on current projections for background traffic growth and anticipated increases in container throughput (or 'ramp up') over time. However, in recognition of the uncertainties in actual throughput increases (due to factors such as future economic growth rates), any funding contribution of the IMT towards these upgrades would be based on the following circumstances:

  – That certain throughput levels at the terminal had been achieved. These throughputs are outlined in column 1 of Table ES.1.

  – That it can be further demonstrated (as part of any subsequent planning approval stage) that the intersection performance would have deteriorated to a level of service E or worse (where previously operating at a LoS D or above) were it not for the implementation of the upgrades outlined in Table ES.1.

> The impact of traffic from the project site, when fully developed and operating at full capacity, represents less than 3.3% of the total traffic already on the M5 Motorway during peak periods. The Project would therefore not have a substantial impact on the motorway operation.

> The mid-block capacity analysis (examining the flow of traffic along the roads between intersections) shows that ratios for all mid-block road sections would continue to perform at similar levels to the base condition with the addition of Moorebank IMT traffic.

Table ES.1 Summary of key intersection upgrade requirements as a result of the Project

Throughputs triggering IMT contributions to upgrades	Upgrade description	Intersections	Indicative upgrade year
Construction of Phase A (no operational throughput)	Signal timing changes, change bus lane on Heathcote Road to general traffic lane (combined left and right turn lane) and second lane to right turn lane.	I-07 – Heathcote Road/ Moorebank Avenue	2016
	Ban right turn on Church Road	I-09 – Moorebank Avenue/ Church Road	
	Signal timing changes	I-12 – Newbridge Road/ Governor Macquarie Drive	
Operation of 250,000 TEU	Signal timing changes	I-08 – Moorebank Avenue/ Industrial Access	2019
Operation of 750,000 TEU	Signal timing changes	I-01 – Hume Highway/ Orange Grove Road I-06 – Newbridge Road/ Moorebank Avenue I-11 – Newbridge Road/Nuwarra Road	2023
	Signal timing changes, extend short right turn lane on M5 East to 230 m in length.	I-14 – Hume Highway/M5 Motorway	
Operation of 1 million TEU	Signal timing changes, changed layout on Governor Macquarie Drive to include a combined through and right turn lane, and dedicated right turn lane of 200 m lengths.	I-12 – Newbridge Road/ Governor Macquarie Drive	2025
	Provide a left, through and right lane and dedicated right turn lane on Canterbury Road.	I-15 – Cambridge Avenue/ Canterbury Road	

Throughputs triggering IMT contributions to upgrades	Upgrade description	Intersections	Indicative upgrade year
Operation of 1.3 million TEU	Signal timing changes.	I-13 – Moorebank Avenue/ M5 Motorway	2028
Operation of 1.55 million TEU	Signal timing changes, 60 m approach and 60 m departure lanes on Hume Highway in the northbound direction.	I-01 – Hume Highway/ Orange Grove Road	2030
	Signal timing changes, additional 60 m right turn lane on the Hume Highway in the northbound direction.	I-03 – Hume Highway/ Memorial Avenue	
	Signal timing changes.	I-04 – Hume Highway/ Hoxton Park Road	

- Construction noise impacts are similar to those identified in the EIS. The deletion of the northern rail option removes some of the most severe noise impacts (at Casula). During peak construction (2016), when piling, excavation and compaction works are undertaken adjacent to the nearest residential receptors the predicted worst case noise levels trigger the requirement for construction noise mitigation to reduce potential levels by up to 12 dBA $L_{Aeq(15minute)}$. For concreting works, predicted noise levels trigger the daytime criteria by 3 dBA $L_{Aeq(15minute)}$ at the nearest receptors in Wattle Grove. Potential noise levels from heavy vehicles operating within the onsite haul roads are within the daytime criteria and would not require specific noise mitigation to reduce the predicted noise levels.

- Operational noise impacts associated with the amendments include:

  > The container handling area at the IMEX terminal will be automated and so will not require audible alarms or beepers. Measured noise levels provided by the manufacturer of the rail mounted gantries (RMGs) are 10 dBA less when operated without the audible warning alarms. This has resulted in some improvements in noise impact relative to the EIS predictions.

  > In the revised Project the need for a rail loop to manage the entry and departure of trains within the site has been removed, which will reduce the likelihood of wheel squeal noise from trains.

  > During operation (Full Build), predicted noise levels comply with the daytime and evening noise criteria at all assessed receptors. Noise levels in the night-time are predicted to comply with the noise criteria at the majority of receptors. Exceedances of up to 4 dB are predicted at the northern extent of Casula and of 2 dB at the western extent of Anzac Road.

  > During adverse weather conditions, predicted noise levels comply with the daytime and evening noise criteria at all assessed receptors in Casula, Glenfield and Wattle Grove with the exception of the western extent of Anzac Road, where noise levels are up to 2 to 3 dB above the daytime and evening noise criteria.

  > Adopting the proposed noise mitigation measures would reduce predicted noise levels by at least 5 dB and would achieve compliance at all assessed receptors.

- Air quality – Predicted local air quality impacts show minor variances in modelled results compared to impacts predicted in the EIS. The predictive dispersion modelling demonstrates that concentrations of pollutants (TSP, PM_{10}, NO_x, CO, SO_2, benzene, toluene, xylene, 1,3-butadiene, acetaldehyde and polycyclic aromatic hydrocarbons) emitted would be below acceptable ambient air quality criteria and would not adversely affect the receiving environment. An exceedance of the annual average $PM_{2.5}$ advisory reporting goal at R33 was predicted to occur due to cumulative

concentrations during Full Build activities. While this receptor was relocated in 2014, it has been retained in the assessment for completeness. The likely future land use at R33 would be associated with the SIMTA project. The elevated ambient background is the key contributor to these exceedances.

- Human health - Predicted impacts on human health of the local community show very minor variation from impacts predicted in the EIS. In addition, the recommendations presented in the EIS in relation to mitigating impacts or enhancing health benefits remain unchanged. Some additional noise mitigation measures have been outlined and these should be considered in conjunction with other mitigation measures outlined in the relevant assessments.

Revised environmental management measures have been proposed to address the impacts associated with the project amendments. These measures will be implemented to reduce the identified environmental impacts associated with the construction and operation of the Project.

Cumulative impact assessments

Based on the agreement with SIMTA for an integrated IMT across both the SIMTA and Moorebank sites, a revised approach to the cumulative assessment of the entire Moorebank precinct has been undertaken. This is presented in Chapter 7 – *Proposed amendments to the development* of this report. In summary the cumulative impact scenarios are as follows:

- Continue to recognise there is a maximum of 1.55 million TEU (IMEX plus interstate freight) for the entire Moorebank precinct.
- Continue to consider alternate scenarios whereby all IMEX capacity is built on the SIMTA site or the Moorebank site but not both.
- Introduce a new cumulative scenario (C1) reflecting a potential Stage 1 development that matches the current SIMTA Stage 1 DA (250,000 TEU) in conjunction with a likely first stage of development of the Moorebank site (500,000 TEU).
- Introduce a new cumulative scenario (C2) reflecting a Full Build (2030) with 500,000 TEU on the SIMTA site (reflecting the cap placed on SIMTA's concept approval) and with the remaining 1.05 million TEU capacity (consisting of 550,000 TEU IMEX and 500,000 TEU interstate) on MIC's site.

The results of the cumulative impact assessment demonstrate that the key issues of concern of noise and traffic would be within acceptable levels, as described below:

Noise and vibration

For all scenarios assessed, the predicted cumulative noise levels during both neutral and adverse conditions comply with the daytime, evening and night-time amenity noise criteria at all assessed receptors in Glenfield and Liverpool. The predicted cumulative noise levels in Casula and Wattle Grove comply with the daytime and evening amenity noise criteria but exceed the night-time amenity noise criteria during neutral weather conditions by up to 3 dBA (with Scenario B representing the worst-case scenario). During adverse weather conditions, the predicted cumulative noise levels would be exceeded by up to 5 dBA (for scenario B) with exceedances at some receptors for all scenarios. The results are outlined in Table ES.2 below.

Cumulative traffic noise impacts are only marginally greater than the background levels (by 1 dBA), which is below the level at which specific mitigation measures are required.

Table ES.2 Predicted cumulative noise levels – all scenarios

Residential receptor	**Predicted Noise Levels, $L_{Aeq, dBA}$**			
	Scenario A		**Scenario B**	
	Neutral weather	**Adverse weather**	**Neutral weather**	**Adverse weather**
Casula	27–**42**	29–**44**	27–**43**	29–**45**
Wattle Grove	35–40	39–**44**	38–**43**	40–**45**
Glenfield	29–32	29–33	31–34	31–34
Liverpool	32–34	38–40	33–33	38–38
Non-Residential Noise Sensitive Receptors	21–**43**	25–**44**	26–**43**	26–**44**
	Scenario C1		**Scenario C2**	
Casula	25–40	26–**42**	27–**41**	28–**43**
Wattle Grove	35–39	38–**42**	35–40	37–**42**
Glenfield	29–32	30–32	31–33	31–34
Liverpool	30–30	35–35	30–32	34–34
Non-Residential Noise Sensitive Receptors	22–40	24–**42**	24–41	26–**43**

Traffic, transport and access

By 2030 a number of intersections will be operating at an unacceptable LoS, under cumulative scenarios A, B and C as a result of background traffic growth (and planned upgrades by RMS) in conjunction with traffic generated by the Moorebank IMT and the SIMTA site. Table ES.3 identifies the treatments required, and by what date, for affected intersections under cumulative scenarios A, B and C. Mitigation treatments would only be applied if an intersection is operating at level of Service (LoS) E or worse as a result of the precinct (i.e. cumulative) traffic above the background growth and cumulative impacts by others. Treatments would not be recommended where a resulting LoS of D or above is achieved, even where performance has deteriorated as a result of the Project.

- Indicative timing of these upgrades is provided in Table ES.1, based on current projections for background traffic growth and anticipated increases in container throughput (or 'ramp up') over time for the IMT. However, in recognition of the uncertainties over actual throughput increases (due to factors such as future economic growth rates), any funding contribution of the IMT towards these upgrades would be based on the following circumstances:
  - That certain throughput levels at the terminal had been achieved. These throughputs are outlined in column 1 of Table ES.1.
  - That it can be further demonstrated (as part of any subsequent planning approval stage) that the intersection performance would have deteriorated to a level of service E or worse (where previously operating at a LoS D or above) were it not for the implementation of the upgrades outlined in Table ES.1.

The upgrades required as a result of background traffic growth combined with traffic generated by the Project and the SIMTA project are presented as potential road network solutions but are not nominated for delivery by the Project as they are based on a number of assumptions which will be proven or otherwise during operations in the period 2018–2030. The delivery funding and mechanisms for delivery network upgrades will be subject to further assessment in consultation with the NSW Government during future DA stages. Intersections I-0B and I-0C in Table ES.3 are intersections that would be constructed in the event that the SIMTA site is developed (i.e. they would not exist under an IMT-only scenario).

Table ES.3 Summary of key intersection upgrade requirements taking account of cumulative traffic

Throughputs triggering IMT contributions to upgrades	Cumulative scenario	Upgrade description	Intersections	Upgrade year
750,000 TEU	C1	Signal timing changes (brought forward from 2023 for IMT-only).	I-01 – Hume Highway/ Orange Grove Road I-06 – Newbridge Road/ Moorebank Avenue	2020
		Signal timing changes, extend short right turn lane on M5 east Motorway to 230 m (brought forward from 2023 for IMT-only).	I-14 – Hume Highway/ M5 Motorway	
1.55 million TEU	C2	Signal timing changes, additional 70 m right turn lane on Elizabeth Drive in the westbound direction.	I-02 – Hume Highway/ Elizabeth Drive	2030
	A, B and C2	Signal timing changes for an additional 75 m right turn lane on the Hume Highway in the southbound direction.	I-04 – Hume Highway/ Hoxton Park Road	
	A, B and C2	Signal timing changes, extend left turn lane on Newbridge Road to 150 m in the westbound direction.	I-06 – Newbridge Road/ Moorebank Avenue	
	A, B and C2	Signal timing changes, short left turn lane of 100 m to Moorebank Avenue slip lane (dual signalised slip lane westbound).	I-13 – Moorebank Avenue/ M5 Motorway	
	A and C2	Signal timing changes; provide a dedicated left turn lane on Moorebank Avenue north.	I-0A – Moorebank Avenue/ Anzac Road	
	B	As for A and C2 plus additional right turn lane on Moorebank Avenue South.		
	B	Provide dual right-turn lanes on SIMTA central access.	I-0B – Moorebank Avenue/ new DNSDC access/ SIMTA northern access	
	B	Provide dual right-turn lanes on SIMTA southern access.	I-0C – Moorebank Avenue/ SIMTA central access	

Local air quality

The following key points are taken from the cumulative modelling results generated for the operations at the Moorebank IMT site and SIMTA site:

- Cumulative incremental impacts (Moorebank IMT and SIMTA only) of all pollutants are below NSW EPA and National Environment Protection Measure (NEPM) advisory reporting goals at all surrounding receptor locations, for all assessed site configurations;
- Additional exceedance of the NSW EPA 24-hour average PM_{10} criterion and NEPM advisory reporting goal for 24-hour average $PM_{2.5}$ is predicted to occur at R33 (which is located on the SMITA site);
- Cumulative annual average (Moorebank IMT and SIMTA (only increment) plus background) $PM_{2.5}$ concentrations exceed the NEPM advisory reporting goal at receptor R33. The exceedance at R33 is attributable to the location of R33 directly among SIMTA site emission sources.
- No other cumulative (Moorebank IMT and SIMTA (only increment) plus background) pollutant exceedances are predicted for any scenario at any of the surrounding receptor locations.

Human health

In relation to the assessment of cumulative impacts from the operation of both the Moorebank and SIMTA sites, the predicted health impacts are generally considered to be low (not significant). The human health risk assessment has identified risks to commercial/industrial properties on Moorebank Avenue currently within the SIMTA site boundary. Mitigation measures are required to minimise exposure to particulates at those sites, however, as all the identified receptors would be relocated with the development of the SIMTA site, these receptors have been discounted from further consideration in the cumulative assessment.

Managing residual impacts

The Project as proposed incorporates a range of mitigation and management measures to ensure it operates within acceptable limits. Many of the impacts have already been reduced through the application of technology or design optimisation:

- The development of the Project layout to maintain a substantial conservation area along the banks of the Georges River, has substantial benefits in terms of biodiversity conservation and preservation of the amenity of the Georges River as well as creating a buffer between the site and residents of Casula.
- The Project layout places warehousing on the western area of the site to provide a buffer between Casula residents and rail operations on site.
- A range of noise mitigation measures, including a noise barrier at the western boundary of the site has been allowed for to protect residents of Casula. In addition, the use of automated cranes has eliminated the need for warning alarms, resulting in a significant reduction in noise levels.
- The on-site operations include the use of Liquefied Petroleum Gas (LPG) generated plant and equipment in place of diesel to minimise impacts on local air quality.
- The rail crossing from the SSFL into the site has been located at the south of the site to minimise noise and visual impacts on residential receivers and to minimise flood risk to surrounding land.

- Traffic access arrangements are designed to prevent truck traffic from entering or leaving the site from the south minimising traffic impacts on local communities.
- Water quality in the Georges River will be maintained or improved through the application of effective water quality management throughout construction and operation of the Project.

Even with these measures in place, a number of residual impacts remain that will require further mitigation and management. Key residual impacts are summarised in Chapter 7 – *Proposed amendments to development* of this report. Strategies to manage residual impacts include the following:

- Minimising native vegetation clearing through careful detailed design. For unavoidable impacts, MIC is currently working closely with NSW OEH and the Commonwealth Department of Environment (DoE) to establish a package of offsets that will ensure that biodiversity values for the affected vegetation communities and species are maintained.
- Other measures to reduce noise emissions (such as rail noise damping and quieter gantry cranes) will be explored with a view to further reducing at-source noise impacts. Once all reasonable and feasible at-source measures have been applied, boundary treatments (such as additional noise walls) would be applied to the satisfaction of the regulators.
- MIC and the future Project operator will continue to work with the NSW Government to evaluate the impacts of the Project on the surrounding road network and will contribute proportionally to upgrading the affected intersections to ensure that the road network functions at an acceptable level into the future.
- Landscaping and urban design treatments would be applied to minimise the visual impact and light spill from the Project.

A detailed schedule of mitigation and management measures to manage residual impacts is outlined in Chapter 9 – *Revised environmental management measures* of this report.

Public benefit test

The Project is in the public's best interest as its residual impacts will be localised and managed; however its benefits will be significant and widespread for the entire community. The benefits include a major contribution to jobs and productivity growth, supply chain efficiency and reduced congestion growth. The local community will receive a share of these benefits as well as a local benefits program. In addition, the public interest is also served by the IMT in terms of its contribution to government policy, the lack of suitable alternative sites; and the unique characteristics of the site which are not needed for other land uses but make it ideal for an IMT. While some local community members oppose the Project, the broader community interest is reflected by strong support from government and industry stakeholders.

Granting development consent for the Project in its entirety as proposed is therefore consistent with the public interest, which satisfies a key aspect of planning decision-making. A reduced throughput IMT would not deliver the strategic certainty, sustainable outcomes nor government objectives and would not be in the public interest.

Planning assessment and approval pathway

MIC is seeking both Commonwealth and NSW Government approvals for the Project concept (i.e. the broad parameters of the Project). That is, MIC is seeking approval to satisfy:

- the Commonwealth requirements for the Project in relation to impacts of the proposed action on matters protected under the EPBC Act (which, in the case of this action, comprise listed threatened species and communities, and impacts on the environment by a Commonwealth agency); and
- a staged SSD consent under the NSW *Environmental Planning and Assessment Act* 1979 (EP&A Act) for the full development (including a Stage 1 consent for Early Works).

Approval of cumulative capacity

MIC recognises there is already an approval for the SIMTA project on the adjacent site. Accordingly MIC has suggested a regime of appropriate conditions of consent, with the key objectives of:

- not exceeding the capacity of the local, regional or state network; and
- demonstrating compliance with the approved environmental and amenity conditions and the effectiveness of the mitigation measures.

The suggested approval regime provides that:

- commencement of construction to provide for an initial throughput of 500,000 TEU on the MIC site can only proceed subject to a further DA and once the consent authority is satisfied that the capacity of the local road network will not exceed background conditions;
- commencement of construction to provide for a further throughput of 550,000 TEU (bringing the total to 1.05 million TEU on the MIC site) can only proceed subject to a further DA and once the consent authority is satisfied that the capacity of the road network will not exceed above background conditions; and
- a total throughput beyond a total 1.05 million TEU (bringing the total to 1.55 million TEU on MIC's) cannot occur unless the consent authority is satisfied that there is not, nor will not be, DA granted on the adjacent land (i.e. the SIMTA site).

Conditions governing the approval of future development application stages

The PAC placed a cap on the SIMTA planning approval on the basis of concerns about the capacity of the road network. This report demonstrates that with suitable modification of key intersections and other supplementary measures outlined in Table ES.3, the road network can be progressively improved to ensure that, allowing for background traffic growth, the road network can be maintained at a LoS commensurate with its 2030 conditions (were there no project), up to a level of 1.55 million TEU.

Additionally this report clearly justifies the development of the Moorebank precinct to a total intermodal capacity of 1.55 million TEU (comprising 1.05 million TEU in IMEX capacity and 500,000 TEU in interstate freight capacity) to meet market demand for containerised goods in western Sydney and to achieve the NSW Government's rail share target. No other site has been identified that could be delivered in the same timeframe and with the same advantages of size and proximity to existing transport corridors. As such, only the Moorebank precinct creates an opportunity to increase Sydney's metropolitan container movements on rail.

To provide a framework for future DA stages, this Stage 1 DA proposes a number of tests and procedures that would have to be satisfied for each successive development stage. These stages are outlined below.

Prior to the granting of development consent for any future stage, the proponent will be required to demonstrate, to the satisfaction of the consent authority, that:

1. the Project is operating within the limits predicted by the EIS, through annual monitoring of key parameters and public environmental reporting of results;

2. adequate consultation with LCC and the local community has been undertaken in accordance with an approved stakeholder engagement plan;

3. the impacts of additional traffic associated with the future development approval stage will be within the capacity of the road network, taking account of background traffic growth and planned road network improvements;

4. arrangements are in place (irrespective of funding source) for the on-time delivery of the necessary road network improvements referred to in point 3 above; and

5. all additional amenity and environmental impacts can be managed to acceptable levels, taking into account the existing impacts of the already completed development plus the additional impacts that will occur as a result of the future development stages.

Future development stages will require the preparation of an EIS for that stage to address the above as well as:

- any other matters prescribed in further SEARs for that stage; and

- any matters identified in any conditions of approval granted by the Minister or PAC for this Stage 1 DA.

Next steps

This Response to Submissions Report has been provided NSW DP&E for consideration. The approval process under the EPBC Act (Commonwealth) and the EP&A Act (NSW) are to proceed in parallel, as follows:

- NSW approval process under the EP&A Act:

  > The Response to Submissions Report will be made publicly available for a minimum of 30 calendar days during which the community and stakeholders will be invited to make written submissions on the report to NSW DP&E.

  > MIC will review submissions received and prepare a Supplementary Response to Submissions Report which addresses issues raised relating to proposed amendments to the development. The Supplementary Response to Submissions Report will be provided to NSW DP&E for consideration.

  > NSW DP&E will prepare an Assessment Report to assist the NSW Minister for Planning in making a determination on the staged SSD application for the Project. The Assessment Report will be made publicly available.

> The NSW Minister for Planning (or the Planning Assessment Commission by delegation) will decide whether to approve the staged SSD application and any conditions of the approval.

> The staged development consent (if received) would provide consent at a concept level for the development, for which detailed proposals for separate parts of the site would be the subject of subsequent DAs. The exception would be for the Early Works package, for which MIC is seeking development consent without the need for further applications.

- Commonwealth approval process under the EPBC Act:

> MIC will provide a formal request to the DoE to vary the EPBC referral (EPBC number 2011/6086) to reflect the proposed amendments to the development.

> MIC will provide final EIS documentation (incorporating the draft EIS, this Response to Submissions Report and the Supplementary Response to Submissions Report) to DoE to reflect changes to the Project since exhibition of the draft EIS.

> DoE will consider the final EIS documentation and the variation to the EPBC referral and will prepare an Assessment Report to assist the Commonwealth Minister (or delegate) in making a determination on the Project.

> The Assessment Report will be made publicly available for a minimum of 30 calendar days.

> The Commonwealth Minister for the Environment (or delegate) will decide whether to approve the Project and any conditions on such approval.

Consultation with key stakeholders and the community will continue during the next stages of the Project from detailed design, to construction and operation. If staged development consent is received, a Community Engagement Plan (CEP) will be prepared and implemented by the contractor selected for the construction and operation of the Project. This will outline the consultation and notification processes during the pre-construction, construction and operation phases of the Project. Further details of future consultation activities are provided in section 3.4 of this report.

Conclusions

The Project is an important infrastructure project for Sydney and NSW. It would increase intermodal capacity in Sydney and would have a number of flow-on benefits across the freight sector and the NSW economy. By providing increased intermodal capacity it is envisaged the unit costs of transporting containers by rail for IMEX and interstate markets would be reduced, and this would lead to an increase in the share of freight movements by rail.

The Moorebank precinct needs to be developed to a total intermodal capacity of 1.55 million TEU, comprising 1.05 million TEU of IMEX capacity and 500,000 TEU in interstate freight capacity to meet market demand for containerised goods in western Sydney and to achieve the NSW Government's rail share target beyond 2020. No other site has been identified that would deliver the same operational efficiency (including an efficiency benefit of competition between terminal users under the terminal open access arrangement) and therefore only the Moorebank precinct creates an opportunity to increase Sydney's metropolitan container movements by rail.

The Project is in the public's best interest as its residual impacts will be localised and managed while its benefits will be significant and widespread for the entire community. The benefits include a major contribution to jobs and productivity growth, supply chain efficiency and reduced congestion growth. The local community will receive a share of these benefits as well as a local benefits program.

Granting development consent for the Project in its entirety as proposed is therefore consistent with the public interest, which satisfies a key aspect of planning decision-making. A reduced throughput terminal will not deliver the strategic certainty, sustainable outcomes or Government objectives and will not be in the public interest.

The EIS and the environmental impacts assessed for the amended concept layout confirm that the impacts associated with the Project are manageable, and recommends a number of mitigation measures to reduce these impacts further during construction and operation of the Project.