

Chapter 4

Overview of submissions



4. Overview of submissions

Chapter 4 provides an overview of the process that was used to collate, analyse and respond to the submissions received during the exhibition of the Environmental Impact Statement (EIS). This chapter also identifies the key issues and sub-issues raised in the key government and community submissions. A detailed discussion on the issues raised by key government and the community is provided in Chapter 5 – *Response to government agency submissions* and Chapter 6 – *Response to community submissions*.

4.1 Analysis process

The NSW Department of Planning and Environment (DP&E) received a total of 1,793 submissions from community members and government agencies between 8 October and 8 December 2014. Of the 1,793 submissions received, 241 of these were from community members (including special interest groups), 9 were from key government agencies and 5 were received from local councils. Liverpool City Council (LCC) completed a letter drop to 183,000 residents in 78 suburbs across south-west Sydney. The letter drop included a completed submission form that the community was encouraged to sign and send to the NSW Minister for Planning. A total of 1,538 submissions were received from this process, which is a response rate of less than 1%. The Moorebank Intermodal Company (MIC) has considered this submission as one single submission (see form letter 3 (submission number 242)).

Submissions were also received from the following special interest groups, community action groups and infrastructure owners/operators:

- Liverpool City Youth Council;
- Interlink Roads Pty Ltd;
- Georges River Environmental Alliance;
- Liverpool Action Group Inc;
- Glenfield Waste Services;
- The No Intermodal Committee (chaired by John Anderson);
- Georges River Combined Councils Committee Inc;
- Action for Public Transport; and
- East Liverpool Progress Association.

Submissions received from special interest groups, community action groups and infrastructure owners (as identified above) were given an individual submission number and collated by NSW DP&E as part of the community submissions. Response to these submissions is therefore included in the response to community submissions (refer to Chapter 6 – *Response to community submissions* of this Response to Submissions Report (this report)).

Detailed submissions were received from local councils and government agencies including LCC, Campbelltown City Council (CCC), Hurstville City Council (HCC), Fairfield City Council (FCC), Bankstown City Council (BCC), Transport for NSW (TfNSW), NSW Office of Environment and Heritage (OEH), NSW Environment Protection Authority (EPA), Fire and Rescue NSW, NSW Rural Fire Service, Sydney Catchment Authority, NSW Department of Primary Industries ((DPI) (including comments from NSW Office of Water and Fisheries NSW)), NSW Health and NSW Ports. Responses to these submissions are provided in Chapter 5 – *Response to government agency submissions* of this report.

4.1.1 Receipt of submissions

Each community submission was assigned an individual number by NSW DP&E. Rather than referring to community members by name, the individual submission numbers have been referenced throughout this report. Submitters can contact NSW DP&E to obtain their individual submission number or access NSW DP&E's website (http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5066).

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 number and diversity of issues raised in community submissions, these matters raised in the 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 report, the intent and the issues raised have been identified. Section 4.2 provides a summary of the key issues and sub-issues raised by the community while Chapter 6 – *Response to community submissions* of this report provides a detailed discussion of the issues raised and MIC's response.

Three standardised form letter submissions were received and a number of community submissions used these form letters to make their submission. For ease of reference, this report references the form letters (1, 2 and 3), rather than referring to each individual submission. Appendix A of this report identifies which submissions were made using the standardised form letters.

Submissions received from government agencies and local councils were reviewed and key issues raised were identified. Issues raised by government were not categorised as the issues raised were specific to each agencies assets and interests. A discussion of the issues raised by government is provided in Chapter 5 – *Response to government agency submissions* of this report.

The EIS was exhibited to seek approval under both the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) and Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and this report seeks to fulfil the submissions reporting requirements under both jurisdictions. NSW DP&E managed all of the submissions received, including acting on behalf of the Department of the Environment (DoE), as submissions were deemed to relate to both jurisdictions unless otherwise stated (in practice, no submissions specifically referred to one jurisdiction or another).

4.2 Summary of key issues and sub-issues

4.2.1 Community submissions

Table 4.1 identifies the key issues raised in submissions from the community, with most submissions raising a number of issues. As illustrated in Table 4.1, the top five issues raised by the community were:

- Project alternatives;
- traffic, transport and access;

- noise and vibration impacts;
- local and regional air quality; and
- human health risks and impacts.

Table 4.1 also identifies the percentage of submissions that raised each key issue.

Table 4.1 Summary of key issues raised by the community

Key issue	No. of submissions raising issue ¹	% of submissions raising key issue
Strategic context and need for the Project	33	18.3
Planning and statutory requirements	11	6.1
Community consultation	7	3.9
Project alternatives	144	80.0
Project development phasing and construction	6	3.3
Traffic, transport and access	113	62.8
Noise and vibration impacts	60	33.3
Biodiversity	24	13.3
Contamination and soils	3	1.7
Hydrology, groundwater and water quality	14	7.8
Local and regional air quality	46	25.6
Greenhouse gas	2	1.1
Aboriginal and European heritage	16	8.9
Visual and urban design	18	10.1
Land use and property	37	20.6
Social and economic impacts	8	4.4
Human health risks and impacts	40	22.2
Cumulative impacts	6	3.3
Environmental risk analysis	4	2.2
General	38	21.1

Note 1 For the purposes of the information provided in Table 4.1, form letters (form letter 1, 2 and 3) have been counted as one submission.

In reviewing and collating the community submissions, a number of sub-issues have also been identified. These relate to the key issues (i.e. traffic, transport and access) and provide further detail on the nature of the issue identified in the submission (e.g. traffic impacts on the M5 Motorway). Table 4.2 identifies the sub-issues identified under each key issue.

Of the 1,793 community submissions received (including form letters), two submissions indicated support for the proposal while the remainder either opposed the Project or provided general comments only (i.e. did not state their objection). MIC's response to the key community issues and sub-issues is provided in Chapter 6 – *Response to community submissions* of this report.

Table 4.2 Summary of key issues and sub-issues raised by the community

Key issue	Sub-issue
Strategic context and need for the Project	Local community benefit Viability of short haul freight for Moorebank Container destinations and freight demands Economic viability of the proposal Funding of infrastructure upgrades
Planning and statutory requirements	Concerns regarding the approval process Recommends that a Master Plan be prepared Confusion over the Defence National Storage Distribution Centre (DNSDC) project Concerns regarding the transparency and adequacy of impact assessments Accuracy of ownership and property details
Community consultation	Adequacy of community consultation Response time to complaints/concerns during operation Adequacy of Citizens' Jury
Project alternatives	Alternative site at Badgerys Creek Alternative site at Eastern Creek Capacity of Chullora Alternative location at Mittagong Alternative site at Auburn-Clyde-Granville Capacity of Enfield Capacity of Port of Newcastle Alternative location for IMT – general Suitability of IMT at Moorebank site Alternative uses for School of Military Engineering (SME) site Confusion over combined proposal for SIMTA and Moorebank IMT Capacity restrictions for SIMTA proposal Need for a whole of precinct approach Capacity of the SSFL Electrification of the SSFL
Project development phasing and construction	Concern regarding 24 hour IMT operations Concern regarding construction period
Traffic, transport and access	Impacts on local roads Traffic impacts on the M5 Motorway Impacts on the Hume Highway Traffic congestion Traffic safety issues Traffic impacts on Moorebank Avenue/M5 Motorway intersection Traffic impacts as a result of trucks Impact on travel times Traffic impacts on emergency services Traffic impacts on the M7 Motorway

Key issue	Sub-issue
	<ul style="list-style-type: none"> Impacts on public transport/opportunities for improvements Timing of traffic surveys and peaks Restriction on southbound heavy vehicle movements during construction Opportunity for a bridge over Georges River Adequacy of traffic assessment Potential spills during construction and operation Degradation of road assets (pavements and bridge) Traffic impact on the WestConnex project in combination with this Project Traffic impacts – general Benefits to toll operators on the M7 Motorway Impacts of induced traffic
Noise and vibration impacts	<ul style="list-style-type: none"> Noise impacts – general Noise impacts at night Noise impacts from IMT operations Wheel squeal Adequacy of noise assessment Accuracy and adequacy of identifying/locating sensitive receptors Adequacy and feasibility of mitigation measures Noise impacts during the day for people needing to sleep Impacts on surrounding suburbs and further afield Noise impacts on the community
Biodiversity	<ul style="list-style-type: none"> Impacts on flora and fauna Impacts on Georges River Pest species and biosecurity risks
Contamination and soils	Contamination impacts
Hydrology, groundwater and water quality	<ul style="list-style-type: none"> Flooding impacts Impacts on Georges River
Local and regional air quality	<ul style="list-style-type: none"> Air quality impacts – general Existing ambient air quality Diesel fumes/emissions Air quality impacts on human health Dust and odour during construction Adequacy of air assessment Adequacy and feasibility of mitigation measures
Greenhouse gas	Carbon footprint of proposal
Aboriginal and European heritage	<ul style="list-style-type: none"> Impacts on heritage sites Adequacy of consultation with Registered Aboriginal Parties
Visual and urban design	<ul style="list-style-type: none"> Light impacts Visual impact of IMT

Key issue	Sub-issue
Land use and property	Impacts on public open space/community facilities Impacts on Georges River Property values
Social and economic impacts	Social impacts from increased travel times Impacts of children getting to school Impact on usability of residential open space Impacts to the local community structure Impacts on quality of living
Human health risks and impacts	Health impacts on the community Air quality impacts on human health Learning difficulties for children Health impacts due to sleep disturbance Impacts on health systems Adequacy of human health assessment
Cumulative impacts	Adequacy of cumulative assessment
Environmental risk analysis	Appropriateness of risk assessment
General	General concern regarding pollution from the IMT General concern raised on impacts of the Project Concerned that the IMT would negatively impact on the quality of life for residents General concern regarding the long term planning for Sydney basin Concerned with crime issues associated with freight terminals Concerned with the impacts of rail access options Concerned with impacts of letter drop Argues that the business case has not been made public Concerned raised in relation to the accuracy and adequacy of identifying/locating sensitive receptors

Sub-issues of most concern under the top five key issues are as follows:

- Project alternatives:
 - > argues the IMT should be located at Badgerys Creek;
 - > argues the Moorebank site is not suitable for the purposes of an IMT;
 - > argues the SME site should be developed for alternative uses (i.e. residential, commercial hub or public recreation/conservation area);
- Traffic, transport and access:
 - > concerned about the impact of the Project on traffic congestion, with congestion already experienced along local and regional arterials;
 - > concerned about the impacts of the Project on traffic safety including issues with trucks 'weaving' onto and off the M5 Motorway and trucks parking and using local roads;

- > questions raised about the adequacy of the traffic assessment, including modelling and assumptions;
- Noise and vibration impacts:
 - > concerned about the impact of IMT operations, particularly at night;
 - > concerned about the noise impacts of wheel squeal and the adequacy of mitigations to address this;
- Local and regional air quality
 - > concerned about the impact of diesel fumes generated from locomotives, heavy vehicles and other equipment;
- Human health impacts;
 - > concerned about the impacts on human health as a result of construction and operation of the IMT including exposure to pollutants and particulate matter, noise and other IMT construction and operational impacts.

Figures 4.1 to 4.3 provide a breakdown by sub-issue of the top three key issues raised by the community members.

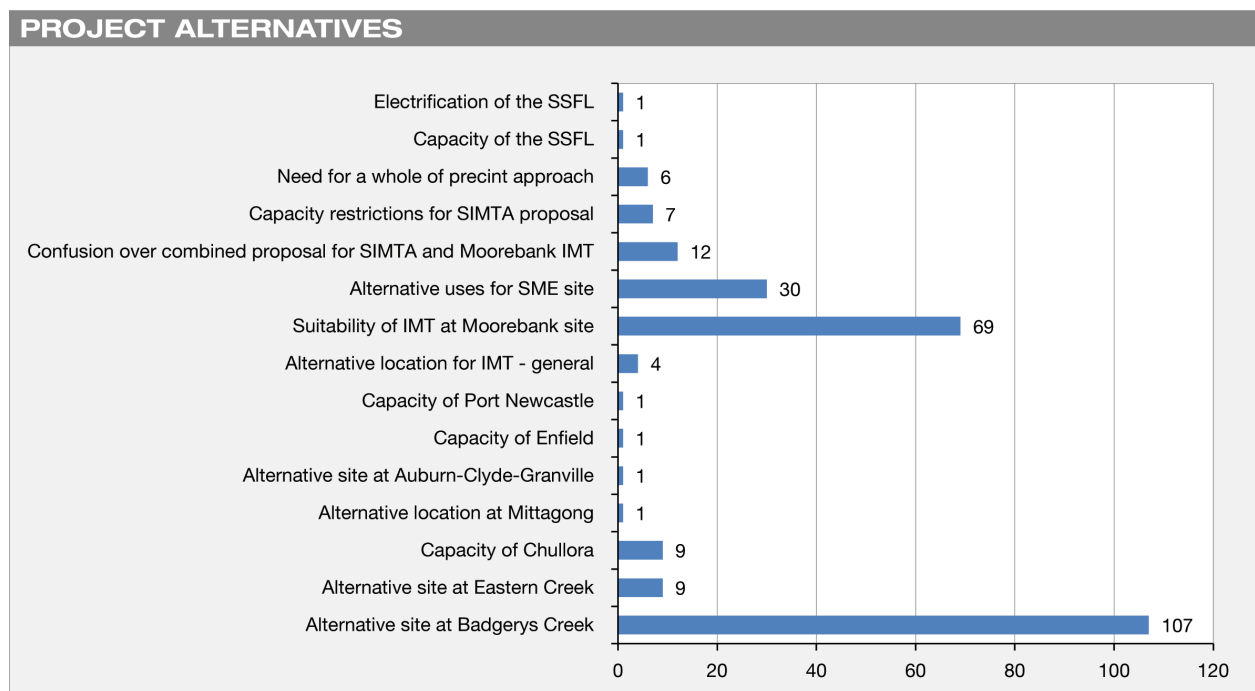


Figure 4.1 Breakdown of sub-issues under key issue 'Project alternatives'

TRAFFIC, TRANSPORT AND ACCESS

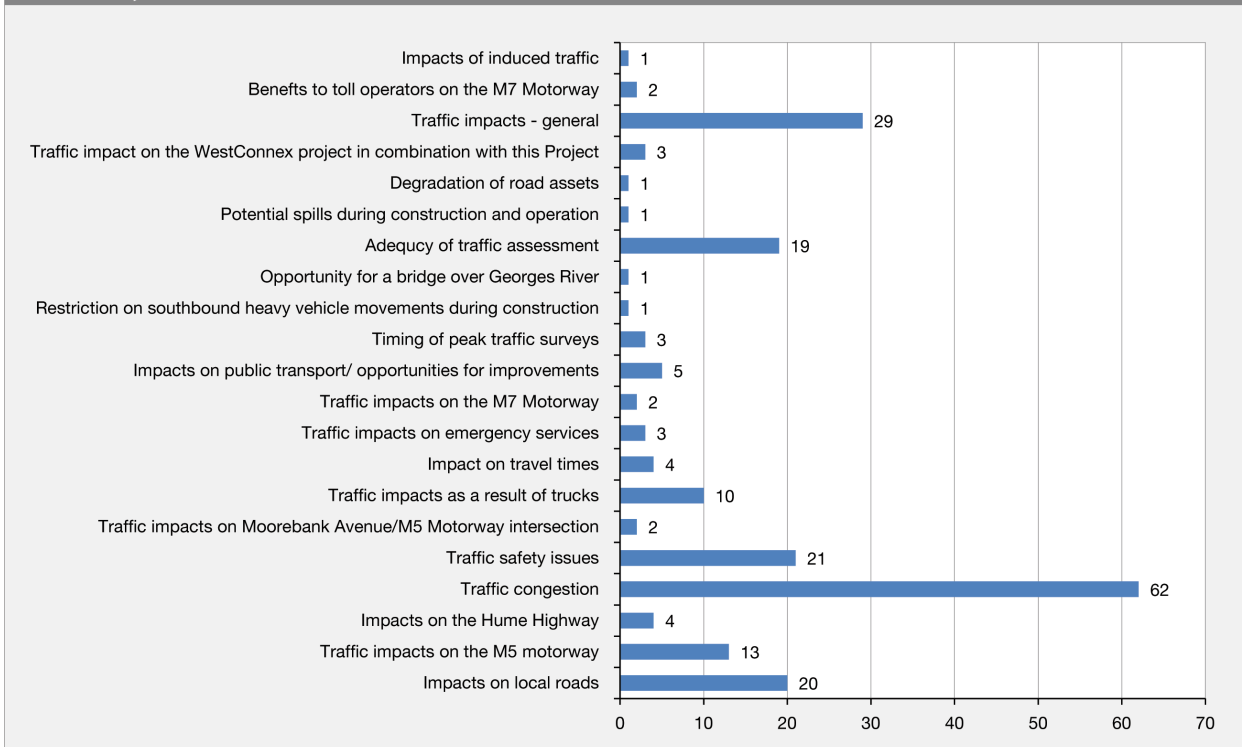


Figure 4.2 Breakdown of sub-issues under key issue 'Traffic, transport and access'

NOISE AND VIBRATION IMPACTS

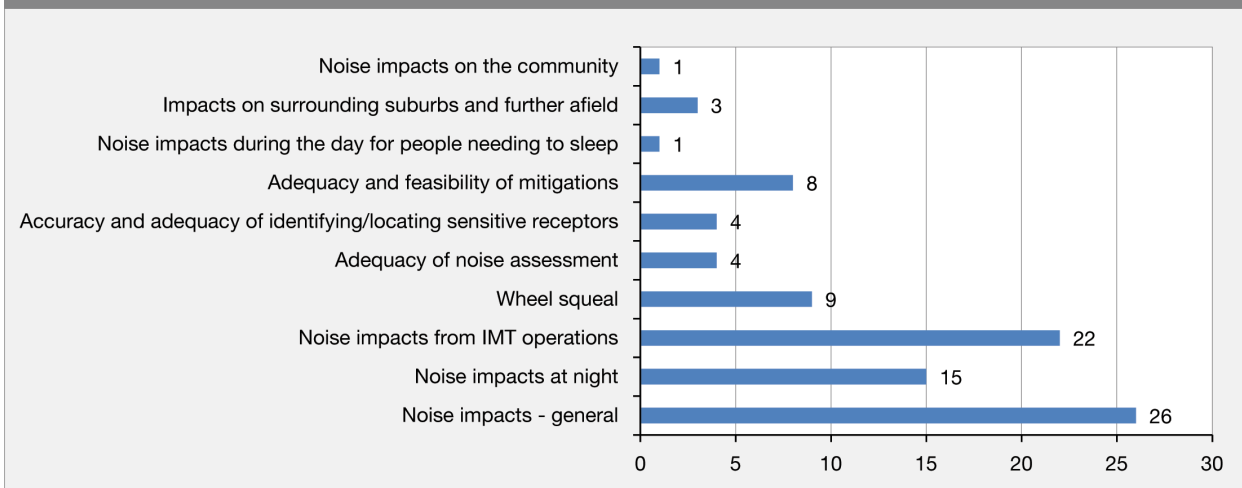


Figure 4.3 Breakdown of sub-issues under key issue 'Noise and vibration'