

Moorebank Precinct West - Concept Modification

Supplementary Response to Submissions -
SSD 5066 MOD1



SIMTA

SYDNEY INTERMODAL TERMINAL ALLIANCE

Part 4, Division 4.1, State Significant
Development

SIMTA MOOREBANK PRECINCT WEST

Concept Modification (Mod 1) – SSD 5066

Supplementary Response to Submissions

Author	Ben Fethers, Stuart Hill	 
Checker	Todd Brookes	
Approver	Westley Owers	
Report No	AA008765 - 01	
Date	4/08/2017	
Revision Text	Final	

This report has been prepared for Qube Property Management Services Pty Ltd in accordance with the terms and conditions of appointment for DD – Land Preparation Works and Associated Design Services (1113396644) dated 19 April 2016. Arcadis Australia Pacific Pty Limited (ABN 76 104 485 289) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

REVISIONS

Revision	Date	Description	Prepared by	Approved by
Final	4/08/2017	Final Report for DP&E Review	Ben Fethers	Westley Owers

CONTENTS

EXECUTIVE SUMMARY	5
Consultation on the Supplementary Response to Submissions	11
Next steps	12
1 INTRODUCTION.....	13
1.1 Background	13
1.2 Clarifications.....	14
Amended Modification Proposal.....	14
Stage 2 of the MPW Project	15
1.3 Purpose of this report.....	15
1.4 Site Context	15
1.5 Site description	16
1.5.1 Moorebank Precinct West (MPW) site.....	16
1.6 Structure of this Report	17
2 CONSULTATION.....	19
3 OVERVIEW OF SUBMISSIONS.....	20
3.1 Submissions Received	20
3.2 Submission Response Methodology.....	21
3.2.1 Government Agencies and Local Councils.....	21
3.2.2 Community	21
3.3 Summary of Community Comments	23
3.3.1 Key Issue Analysis	23
3.4 Other submissions.....	28
4 RESPONSE TO GOVERNMENT AGENCY SUBMISSIONS	29
4.1 Office of Environment and Heritage	29
4.2 Department of Primary Industries.....	33
4.3 Environment Protection Authority.....	36
4.4 NSW Heritage Council	36
4.5 Department of Industry (Resources and Energy).....	37
4.6 NSW Health.....	38
4.7 Liverpool City Council	40
5 RESPONSE TO COMMUNITY SUBMISSIONS	48
5.1 Special interest groups.....	48
5.1.1 ABB Australia Pty Ltd (ABB)	48
5.1.2 East Liverpool Progress Association.....	50

5.1.3 Liverpool Action Group..... 54

5.1.4 Moorebank Residents Action Group..... 56

5.2 Community Submissions 58

6 REVISED ENVIROMENTAL MITIGATION MEASURES..... 153

7 CONCLUSION 209

7.3 Next steps 211

APPENDICES

APPENDIX A
Community Response Table

APPENDIX B
Additional Supporting Information

GLOSSARY

Term	Definition
AAQ NEPM	National Environment Protection (Ambient Air Quality) Measure
ACM	Asbestos containing material
AEP	Annual exceedance probability
AQIA	Air Quality Impact Assessment
B99	Building 99
CBD	Central business district
CNVMP	Construction Noise and Vibration Management Plan
CTAMP	Construction Traffic and Access Management Plan
CUST	Cullen Universal Steel Truss
dBA	Decibel
DCP	Development Control Plan
DMP	Dust Management Plan
DPE	Department of Planning and Environment
Early Works Approval	Approval for the Early Works (Stage 1) component of the MPW Project under the MPW Concept Plan Approval (SSD 5066) and the (yet to be granted) MPW EPBC Approval. Largely contained in Schedule 3 of the MPW Concept Plan Approval.
Early Works area	Includes the area of the MPW site subject to the Early works approved under the MPW Concept Plan Approval (SSD 5066).
EEC	Endangered Ecological Communities
ENM	Excavated Natural Material
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPA	Environmental Protection Authority
EPBC Act	Environment Protection Biodiversity Conservation Act 1999
EPL	Environmental Protection Licence
IMT	Intermodal Terminal
LEP	Local Environment Plan
LGA	Local Government Area
LMARI	Liverpool Moorebank Arterial Road Investigations
LOS	Level of Service
MCoA	Modification Conditions of Approval
MIC	Moorebank Intermodal Company
Moorebank Precinct West (MPW) Concept EIS	The Environmental Impact Statement prepared to support the application for approval of the MPW Concept Plan and Early Works (Stage 1) under the Environment Protection and Biodiversity Conservation Act 1999 and the Environmental Planning and Assessment Act 1979.
MPW Concept EIS	EIS prepared by Parsons Brinckerhoff (December 2015) for the purposes of the Commonwealth EPBC Referral (2011/6086).

Term	Definition
Moorebank Precinct West (MPW) Intermodal Terminal Facility/IMT facility	The Intermodal terminal facility on the MPW site, including truck processing, holding and loading areas, rail loading and container storage areas, nine rail sidings, loco shifter and an administration facility and workshop.
MPW Stage 2 EIS	The Environmental Impact Statement prepared by Arcadis (October 2016) to support the application for approval of the MPW Stage 2 Proposal under the Environment Protection and Biodiversity Conservation Act 1999 and the Environmental Planning and Assessment Act 1979.
NML	Noise monitoring locations
NPW	National Parks and Wildlife Act
OEH	Office of Environment and Heritage
OOH	Out of Hours
PAD	Potential Archaeological Deposit
PB	Parsons Brinckerhoff
PM10	Particulate matter with a mean aerodynamic diameter of 10µm
PM2.5	Fine particles with a diameter of 2.5µm or less
POEO	Protection of Environmental Operations Act
RAAF	Royal Australian Air Force
RAE	Royal Australian Engineers
RAP	Registered Aboriginal Party
RBL	Rating Background Noise Levels
Revised Environmental Management Measures (REMMs)	The environmental management measures for the MPW Concept Plan Approval as presented within the Supplementary Response to Submissions (SRtS) (PB, 2015) and approved under the MPW Concept Plan Approval.
RNP	Road noise policy
ROL	Road Occupancy Licence
RtS	Response to Submissions Document
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SSD	State Significant Development
SSFL	Southern Sydney Freight Line
STRARCH	Stressed Arch
SWMP	Soil and Water Management Plan
TEC	Threatened ecological community
TEU	Twenty-foot Equivalent Unit or standard shipping container
TSC	Threatened Species Conservation Act
TSP	Total Suspended Particles
VENM	Virgin Excavated National Material

EXECUTIVE SUMMARY

Overview

SIMTA are seeking approval for the modification of the MPW Concept Approval (SSD 5066).

The MPW Concept Modification Report (Arcadis, 2016) was prepared, pursuant to Section 96(2) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to amend the approved MPW Concept (SSD 5066). This report sought approval for additional site preparatory works, including the import, placement and stockpiling of 1,600,000 m³ of clean general fill, as a modification to SSD 5066 (referred to as the Modification Proposal), to be undertaken as part of MPW Early Works (i.e. Stage 1 of the MPW Project).

The MPW Concept Modification Report was publicly exhibited in accordance with clause 83 of the *Environmental Planning and Assessment Regulation 2000* between 7 July 2016 and 22 August 2016.

Subsequent to the exhibition of the MPW Concept Modification Report, SIMTA reconsidered the timing and need for the additional site preparatory works to be undertaken during the MPW Early Works. As a result, the Modification Proposal was amended (thereby known as the Amended Modification Proposal) and presented within the MPW Concept Modification Response to Submissions Report (MPW Concept Modification RtS) (Arcadis, December 2016).

The Amended Modification Proposal departs from the Modification Proposal in that the importation of clean general fill would occur during Stage 2 of the MPW Project, rather than Stage 1 Early Works of the MPW Project, and would be subject to approval under Stage 2 of the MPW Project. The Amended Modification Proposal also includes a number of other minor modifications to the MPW Concept Approval to facilitate the future stages of development for the MPW Project. An assessment of environmental impacts associated with the Amended Modification Proposal is provided in Section 7 of the MPW Concept Modification RtS.

The MPW Concept Modification RtS for the Amended Modification Proposal was prepared to satisfy the provisions of Section 89G of the EP&A Act and Clause 85A of the EP&A Regulation, and publicly exhibited between 14 December 2016 and 24 February 2017. During this period, a total of 194 submissions were received from the community, including landowners, occupants and community interest groups. Seven submissions were received by Government stakeholders.

The purpose of this Supplementary Response to Submissions (SRtS) is to respond to submissions provided by both community and Government stakeholders during the exhibition of the MPW Concept Modification RtS for the Amended Modification Proposal. This SRtS has been prepared to satisfy the provisions of Section 89G of the EP&A Act and Clause 85A(2) of the EP&A Regulation. Each of the submissions received has been collated, analysed and addressed as relevant.

Project benefits

The MPW Project, including the Amended Modification Proposal, includes infrastructure which is critical to the on-going distribution of freight port shuttle operations, interstate, intrastate and throughout the Sydney Metropolitan Area. The MPW Project also contributes considerably to a change in mode share (from road to rail) which would result in positive benefits for the Sydney region.

Projected growth in trade volumes will lead to an increase in freight movements interstate, intrastate and across the Sydney Greater Metropolitan Area. This will pose substantial challenges for the supply chain, which is currently dominated by road transport of freight. To meet these challenges and to allow for increased use of rail, it

is necessary to invest in new intermodal terminal capacity, to develop dedicated freight rail lines, to widen the orbital motorway network and ideally to complete the missing linkages in the current orbital motorway network, and to improve the rail interface at Port Botany.

The MPW Project, including the Amended Modification Proposal, would deliver the following significant benefits:

- Reduction in the potential increase in regional freight movements along the M5 Motorway between Port Botany and Moorebank Avenue, thereby easing the Port Botany bottleneck enabling the Port to cope with future growth and provide largescale freight capacity
- Transfer of road haulage between NSW ports and Western Sydney to rail freight for redistribution thereby helping to reduce traffic congestion and providing improved efficiency for the Sydney road network
- Reductions in articulated truck volumes through the Sydney Central Business District (CBD) and inner city suburbs on the M4 Motorway and the M5 Motorway east of the Moorebank Avenue interchange
- Reductions in heavy vehicle movements between NSW ports and Moorebank, thereby relieving the regional Sydney road network of articulated vehicular traffic
- Enhanced articulated truck flows, particularly on the M7 Motorway, Hume Highway and Mamre Road south of the M4 Motorway as well as the M5 Motorway between Moorebank Avenue interchange and the M7 Motorway
- Reductions in vehicle operating costs for heavy vehicles on the regional road network
- Reductions in vehicle emissions, and subsequently greenhouse gas emissions, resulting from a change in mode share from road to rail.

The Amended Modification Proposal provides opportunities to optimise the operation of the IMT facility, facilitate the construction process, and address flooding and drainage issues.

Consultation on the Response to Submissions

The Modification Proposal (presented within the MPW Concept Modification Report) was publicly exhibited between 7 July 2016 and 22 August 2016.

Subsequent to exhibition of the MPW Concept Modification Report, amendments were made (i.e. the Amended Modification Proposal), which were detailed in the MPW Concept Modification RtS, (Arcadis, December 2016). The MPW Concept Modification RtS was publicly exhibited between 14 December 2016 and 24 February 2017.

During the preparation of the MPW Concept Modification RtS and public exhibition period, consultation activities were undertaken to engage key stakeholders and the community on information within the MPW Concept Modification RtS and provide guidance on the submissions process. This consultation was undertaken through a range of mediums including emails, phone conversations, face-to-face meetings and letter submissions. Submissions for the MPW Concept Modification RtS regarding the Amended Modification Proposal were received by the NSW Department of Planning and the Environment (DP&E) during the exhibition period. These submissions were categorised and addressed within Section 5 of this SRtS.

Changes undertaken post Response to Submissions exhibition

The Amended Modification Proposal, as detailed and assessed in the MPW Concept Modification RtS, included the amendments to the Modification Proposal:

- Altered construction footprint
- Clean general fill importation
- Interaction between the MPW and MPE sites
- Changes to approved function and re-arrangement of approved uses
- Maximum building heights
- Staging of future applications
- Subdivision.

Overall, the MPW Concept Modification RtS concluded that the Amended Modification Proposal would result in environmental impacts that are consistent with those identified for the MPW Concept Approval, and these potential impacts can be adequately managed through the implementation of the Minister's Conditions of Approval (MCoA), the Revised Environmental Management Measures (REMMs) provided within the MPW Concept Approval and additional mitigation measures identified in Section 8 of the MPW Concept Modification RtS.

The Amended Modification Proposal proposes a development which is 'substantially the same' as that provided within the MPW Concept Approval in that it would facilitate the development of an intermodal terminal facility with the same IMT throughput limitations, warehousing GFA, freight village, truck parking and other ancillary development as provided within the MPW Concept Approval. On this basis, the Amended Modification Proposal is considered substantially the same development as the MPW Concept Approval and can be considered for approval under s96(2) of the EP&A Act.

No further amendments to the Modification Proposal are proposed within this SRtS in addition to those presented within the MPW Concept Modification RtS. Therefore, no additional environmental assessment has been undertaken.

Purpose of this report

This SRtS includes consideration of all comments raised during the exhibition of the MPW Concept Modification RtS and provides additional information, where necessary, to respond to concerns raised by all stakeholders. Further, where required, the mitigation measures (previously provided within Section 8 of the MPW Concept Modification RtS) have been updated and included within this SRtS (refer to Section 6 of this SRtS).

Overview of submissions

Submissions were received from a total of seven government agencies and local councils, comprising the following:

- Office of Environment and Heritage (OEH)
- Department of Primary Industries (DPI)
- Environment Protection Authority (EPA)
- Heritage Council
- Department of Industry (Resources and Energy)
- NSW Health

- Liverpool City Council (LCC)

In addition to this, DP&E received a total of 194 submission from community members, landowners and special interest groups, including:

- ABB Australia Pty Ltd (ABB)
- East Liverpool Progress Association
- Liverpool Action Group
- Moorebank Residents Action Group.

Of the 194 submissions 75% were from residents in the Liverpool Local Government Area (LGA) and 18% from residents within the Campbelltown, Bankstown, North Shore and Parramatta LGA's. The remaining 7% of submissions did not provided a location.

As demonstrated within Sections 3 and 5 of this SRtS, a large number of community submissions received were not directly relevant to the scope of the Amended Modification Proposal, but rather were submitted in relation to other components of the overall Moorebank Precinct. That is, the submissions were related to the MPW Concept Approval (SSD 5066) and aspects of the Moorebank Precinct East (MPE) Stage 2 Proposal (EIS, Arcadis, December 2016) and MPE Concept Plan Modification Proposal (MPE Concept Plan Modification Report, Arcadis November 2016).

Key Issues

The key aspects and issues that have been raised by the community during the submission of the MPW Concept Modification RtS for the Amended Modification Proposal include:

- Traffic and transport (85 submissions):
 - Congestion – general concerns about congestion associated with the traffic movements generated by the Amended Modification Proposal
 - Road infrastructure – existing road infrastructure surrounding the MPW site is unable to service an increase in vehicle movements for the Amended Modification Proposal.
- Community (64 submissions):
 - Impacts to community and lifestyle – general concerns that the Amended Modification Proposal would impact on households, particularly those with children, and that the character of the area would be changed
 - Consultation – concerns that the consultation process conducted has not been sufficient and that SIMTA has not been listening to the community's voice
- Natural environment (61 submissions):
 - Impact on local river systems – concerns that the Amended Modification Proposal will negatively impact South-West river systems in particular damage and degradation to the Georges River
 - Importation of clean general fill – a number of submissions expressed concern that clean general fill would arrive at the MPW site untested and pose a contamination risk. Concern was also raised that the importation of clean general fill is excessive and not necessary given the existing site.

Other Issues

Other issues raised in submissions include:

- Planning process (49 submissions)
- Noise impacts (26 submissions)

- Human health (38 submissions)
- Economics (24 submissions)
- Air quality (21 submissions)
- Flora and fauna (12 submissions).

Figure 0-1 displays the number of submissions received by aspect.

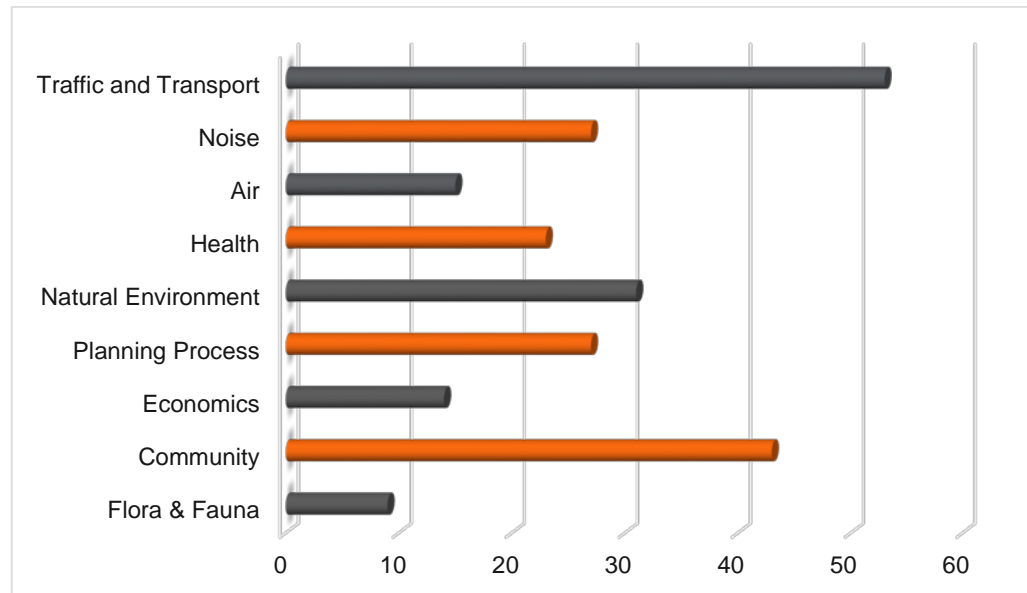


Figure 0-1 Number of submissions by aspect

Government agencies and Councils raised similar concerns to those raised by the community. However, some Government agencies identified they had no further issues and that they felt the MPW Concept Modification RtS addressed their comments (Department of Industry, Heritage Council).

Sections 4 and 5 of this SRtS present the issues raised in the submissions and the corresponding responses.

Consultation on the Supplementary Response to Submissions

Consultation with government agencies, Councils, key stakeholders and the community has continued subsequent to the exhibition of the MPW Concept Modification RtS and during the preparation of this SRtS. The purpose of this consultation has been to discuss the Amended Modification Proposal and submissions received, and gain a greater understanding of any perceived key issues, with a view to resolving these where possible.

Agency stakeholder consultation for this SRtS was limited to the submissions received via the public exhibition process and further discussions undertaken concurrently with MPW Stage 2 Proposal. Ongoing discussions with DP&E have been undertaken relating to the Amended Modification Proposal. Commencing in January 2017, these discussions have included meetings, emails and provision of information to identify the proposed approach to the Amended Modification Proposal.

DP&E, along with other agencies and stakeholders, have provided a number of comments regarding the content of the MPW Concept Modification RtS and SRtS, the Amended Modification Proposal. These comments have been considered and this SRtS has been updated accordingly.

SIMTA is committed to continuing to consult with stakeholders, including the community throughout the planning of the MPW Project, including the Amended Modification Proposal, and future stages of development. Feedback can be provided to SIMTA at any time via:

- The SIMTA Project website (www.simta.com.au)
- The email feedback system (consulting@elton.com.au)
- The free-call information line (1800 986 465) which is available between 8:30am and 5:00pm weekdays.

Next steps

The DP&E will, on behalf of the NSW Minister for Planning, review the MPW Concept Modification Report, the MPW Concept Modification RtS and this SRtS. Once the DP&E has completed its assessment, a draft assessment report will be prepared for the Secretary of the DP&E, which may include recommended conditions of approval.

The assessment report will then be provided to the Planning Assessment Commission (PAC) for consideration. The PAC would determine the Amended Modification Proposal, with any conditions considered appropriate.

The PAC's determination, including any conditions of approval and the Secretary's report, will be published on the DP&E's website immediately after determination, together with a copy of this SRtS.

1 INTRODUCTION

1.1 Background

SIMTA are seeking approval for the modification MPW Concept Approval (SSD 5066).

The MPW Concept Modification Report (Arcadis 2016) was prepared, pursuant to Section 96(2) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to amend the approved MPW Concept (SSD 5066). This report sought approval for additional site preparatory works, including the import, placement and stockpiling of 1,600,000 m³ of clean fill, as a modification to SSD 5066 (referred to as the Modification Proposal), to be undertaken as part of MPW Early Works (i.e. Stage 1 of the MPW Project).

The MPW Concept Modification Report was publicly exhibited in accordance with clause 83 of the *Environmental Planning and Assessment Regulation 2000* between 7 July 2016 and 22 August 2016. During this period, a total of 371 submissions were received from the community, including landowners, occupants and community interest groups. Nine submissions were received from government agency stakeholders.

Subsequent to the exhibition of the MPW Concept Modification Report, SIMTA reconsidered the timing and need for the additional site preparatory works to be undertaken during the MPW Early Works. As a result, the Modification Proposal was amended (thereby known as the Amended Modification Proposal) and presented within the MPW Concept Modification Response to Submissions Report (MPW Concept Modification RtS), prepared by Arcadis in December, 2016.

The Amended Modification Proposal departs from the Modification Proposal in that the physical importation of fill would now not occur as part of the MPW Early Works. Rather these works are now proposed (under the Amended Modification Proposal) to be undertaken as part of Stage 2 of the MPW Project, and would be subject to a separate approval process. The Amended Modification Proposal also includes a number of other minor modifications to facilitate the future stages of development for the MPW Project. A summary of amendments to the Modification Proposal sought is as follows:

- Importation of clean general fill – importation of 1,600,000m³ of clean general fill for the purposes of site formation (to be undertaken as part of Stage 2 of the MPW Project)¹
- Altered construction footprint – impact on additional parcels of land for the purposes of construction of the MPW Project
- Interaction between MPW and MPE sites – transfer of operational vehicles between the MPW and MPE sites for the purposes of container handling between the IMTs and warehouses on each site
- Intermodal terminal facility (interstate, intrastate and port shuttle rail freight) – re-classification of the freight that can be handled through the existing approved interstate terminal to include intrastate and port shuttle rail freight movements
- Re-arrangement of existing approved uses – land function adjustments associated with freight village, truck parking and OSDs

¹ The Amended Modification Proposal would see the physical importation of fill undertaken as part of Stage 2 of the MPW Project (subject to separate approval), rather than Stage 1 Early Works as initially proposed under the MPW Concept Modification (Modification Proposal).

- Maximum building heights – adjustment of building heights (identified in the MPW Project) to reflect revised ground levels associated with the importation of fill
- Staging of future applications – alteration to future staging of the MPW Project for the purposes of addressing market demand
- Subdivision – subdivision of the MPW site to facilitate for long-term leases for proposed development.

The MPW Concept Modification RtS, which included the Amended Modification Proposal, was prepared to satisfy the provisions of Section 89G of the EP&A Act and Clause 85A of the EP&A Regulation, and was publicly exhibited between 14 December 2016 and 24 February 2017. During this period, a total of 194 submissions were received from the community, including landowners, occupants and community interest groups. Seven submissions were received by Government stakeholders.

These submissions (received during the MPW Concept Modification RtS public exhibition period) form the subject of this report, known as a 'Supplementary Response to Submissions' (SRtS), and are discussed and addressed within.

1.2 Clarifications

Amended Modification Proposal

Since exhibition of the MPW Concept Modification RtS, design progression has identified that there is no longer a need to alter the construction footprint to the extent identified in the Amended Modification Proposal. Specifically, the inclusion of the ABB Australia Pty Limited site (i.e. lots 2 and 3 of DP 32998) is no longer included within the construction footprint.

As a result, the proposed modifications to the MPW Concept Approval conditions included in the Amended Modification Proposal (refer to Section 6.4 of the MPW Concept Modification RtS) should be updated as follows:

Schedule 1

Land:

- Intermodal Site: Land generally described as being located on the western side of Moorebank Avenue, between the M5 Motorway and the East Hills Passenger Line, Moorebank, comprising:
 - Lot 1 DP 1197707
 - Lot 2 DP 1197707
 - Lot 101 DP 1049508
 - **Lot 3 of DP 1197707**
 - **Public road reserve of Moorebank Avenue and part of Anzac Road**
 - Lot 100 DP 1049508

This adjustment to the construction footprint would not result in any changes to the environmental assessment included in the MPW Concept Modification RtS, therefore no further environmental assessment is considered to be required in this SRtS.

Stage 2 of the MPW Project

For information purposes the Application for Stage 2 of the MPW Project (SSD 16_7709) (EIS exhibited between October 26 2016 and November 11 2016) is currently at the Response to Submissions stage at the time of writing this SRtS (April 2017). A number of amendments to the Proposal as described in the EIS for Stage 2 of the MPW Project have been proposed as a result of progressive design development during the preparation of that application. These amendments are described in the MPW Stage 2 Response to Submissions Report, and include:

- Alignment of operational hours for warehouses to the IMT facility and Port freight operations to enable freight movements outside of peak traffic times
- Drainage works:
 - Inclusion of OSD (Basin 10) and relocation of OSD (Basin 3)
 - Re-sizing of OSD basins (basins 5, 6 and 8)
 - Reduction to the widths of selected OSD outlet channels
 - Provision of an additional covered drain within the Endeavour Energy easement
- Identification of container wash-down facilities and de-gassing area within the IMT facility
- Illuminated backlit signage within the warehousing area
- Inclusion of an upgraded layout for the Moorebank Avenue/Anzac Road intersection
- Adjustments to warehouse layouts.

These Amended Proposal components (as proposed within the MPW Stage 2 RtS) are reflective of progressive design detail for Stage 2 of the MPW Project and thus are not items associated with the Modification under the MPW Concept (i.e. the Amended Modification Proposal).

1.3 Purpose of this report

The purpose of this SRtS is to respond to submissions provided by both community and government stakeholders during the exhibition of the MPW Concept Modification RtS which described the Amended Modification Proposal. This SRtS has been prepared to satisfy the provisions of Section 89G of the EP&A Act and Clause 85A(2) of the EP&A Regulation. Each of the submissions received has been collated, analysed and addressed (as relevant).

1.4 Site Context

The MPW site is located approximately 27 km south west of the Sydney Central Business District (CBD) and approximately 26 km west of Port Botany. The MPW site is situated within the Liverpool Local Government Area (LGA), in Sydney's South West sub-region, approximately 2.5 km from the Liverpool City Centre.

A number of residential suburbs are located in proximity to the MPW site, including:

- Wattle Grove, 1000 m to the east of the MPW site
- Moorebank, 630 m to the north of the MPW site

- Casula, 300 m to the west of the MPW site
- Glenfield, 820 m to the south west of the MPW site.

1.5 Site description

1.5.1 Moorebank Precinct West (MPW) site

The MPW site is generally bounded by the Georges River to the west, Moorebank Avenue to the east, the East Hills Railway Line to the south and the M5 Motorway to the north. The MPW site is located on Moorebank Avenue, Moorebank and comprises Lot 1 in Deposited Plan (DP) 1197707 and Lot 100 DP 1049508, which is wholly owned by Moorebank Intermodal Company (MIC), and leased by SIMTA. Other parcels of land that would be impacted by the MPW Project during road upgrades include:

- Moorebank Avenue, owned by the Commonwealth Government, south of Anzac Road Lot 2, DP 1197707
- Moorebank Avenue, owned by Roads and Maritime Services, north of Anzac Road
- A portion of Bapaume Road, a public road that is the responsibility of Liverpool City Council, to the north
- A portion of Anzac Road, a public road that is the responsibility of Liverpool City Council, to the east of Moorebank Avenue.

The key existing features of the MPW site are:

- Relatively flat topography, with the western edge flowing down towards the Georges River, which forms the western boundary of the MPW site
- Direct frontage to Moorebank Avenue, which is a publicly used private road, south of Anzac Road and a publicly used and owned road north of Anzac Road
- The site has been developed and comprises low-rise buildings, including warehouses, administrative offices, residential buildings, access roads, open areas, landscaped fields and the Royal Australian Engineers (RAE) Golf Course and Club. All buildings on the MPW site are currently unoccupied and are approved for removal during the MPW Early Works
- Vegetation exists along the western edge of the MPW site, with riparian vegetation along the banks of the Georges River. The riparian vegetation corridor provides a wildlife corridor and a buffer for the protection of soil stability, water quality and aquatic habitats. This area has been defined as a conservation area as part of the MPW Concept Approval
- Native vegetation is scattered across the MPW site
- Much of the MPW site has been developed for Defence purposes, however heritage and biodiversity values still remain on the site
- A strip of land along the western edge of the MPW site lies below the 1% annual exceedance probability flood level. This area generally corresponds to the proposed conservation area.

Figure 1-1 shows the MPW site location.

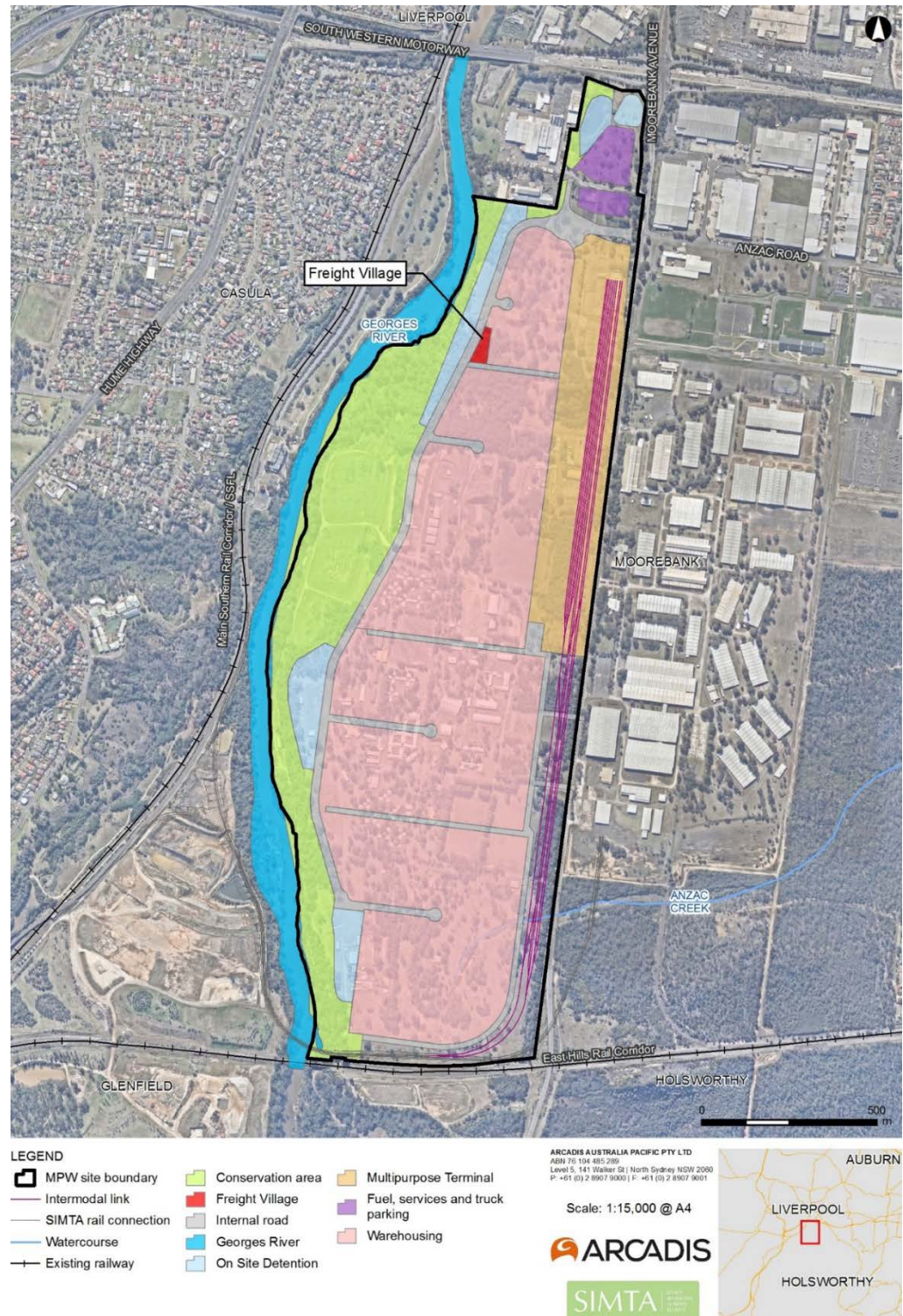


Figure 1-1: Amended Modification Proposal layout

1.6 Structure of this Report

The structure of this SRtS report is as follows:

- **Executive Summary:** provides a brief overview of the SRtS including the identification of key issues

- **Section 1 – Introduction:** provides site context and an overview of the MPW Concept Plan Approval (SSD 5066), the Modification Proposal and Amended Modification Proposal
- **Section 2 – Consultation:** outlines the consultation undertaken during the exhibition of the MPW Concept Modification RtS and preparation of this SRtS
- **Section 3 – Overview of Submissions:** provides an analysis of the submissions received during the exhibition of the MPW Concept Modification RtS and identifies key issues raised
- **Section 4 – Response to Government Agency Submissions:** provides a catalogue of submissions received from Government Agencies and responses prepared by SIMTA's technical specialists
- **Section 5 – Response to Community Submissions:** provides a summary of the community submissions received and responses to each of these prepared by SIMTA's technical specialists
- **Section 6 – Revised compilation of mitigation measures:** provides an updated list of mitigation measures to include any changes as a result of submissions received
- **Section 7 – Conclusion:** provides a summary and conclusion to this MPW Amended Concept Modification Approval process.

The following appendices are included in this SRtS report:

- Appendix A – Community Response Table
- Appendix B – Additional response to Liverpool City Council's) submission to the MPW Concept Modification Report

As outlined above, no further amendments are proposed within this SRtS from that proposed as part of the Amended Modification Proposal within the MPW Concept Modification RtS. This SRtS document represents the continued focus on, and commitment to, transparency and collaboration with agencies and community.

2 CONSULTATION

Consultation with government agencies, councils, special interest groups and the community has been undertaken as part of the preparation of this SRtS. A summary of consultation activities is provided below.

As there are no further design amendments proposed as part of this SRtS, agency stakeholder consultation for this SRtS was limited to the submissions received via the public exhibition process. Ongoing discussions with DP&E have been undertaken relating to the Amended Modification Proposal. Commencing in January 2017, these discussions have included meetings, emails and provision of information to identify the proposed approach to the modification.

Community consultation for the MPW Project has been undertaken periodically, via a number of mediums, prior to and throughout the assessment of the MPW Concept Plan Approval. Consultation with the community was undertaken as part of the MPW Concept Modification RtS exhibition/public notification period as required under s96(2) of the EP&A Act. In addition, a newsletter was distributed in November 2016 by SIMTA to approximately 10,000 households in the suburbs surrounding the MPW site. The purpose of the newsletter was to provide information regarding the proposed MPW Concept Modification Proposal works, and detail how they could submit feedback or request more information.

Registered Aboriginal Parties (RAPs) have not been consulted during the exhibition of the MPW Concept Modification RtS as the Amended Modification Proposal is consistent with the approach identified in the MPW Concept Plan Approval and does not result in any further impacts on Aboriginal heritage. The Revised Environmental Management Measures (REMMs) and Ministers Conditions of Approval (MCoAs) would be implemented to provide management and protection of Aboriginal heritage or the other works which have previously been included (not part of this modification) in the MPW Project. Consultation with key stakeholder groups, agencies and the public would be ongoing as part of the MPW Project, including the Amended Modification Proposal.

Consultation was undertaken for the Amended Modification Proposal, post preparation of the RtS, concurrently with the MPW Stage 2 Proposal. This consultation² included discussions with the following:

- ABB
- NSW Ports
- Moorebank Heritage group
- Transport for NSW (TfNSW) and Roads and Maritime
- DPI

The above comments provided through this consultation was considered however, at a Concept level the key consultation of relevance is with ABB in relation to the impact on their site. ABB raised concern that the MPW Project (Amended Modification Proposal and MPW Stage 2 Proposal) would involve physical works on their site to accommodate drainage to the Georges River. As a response, a redesign of the northern part of the MPW site was undertaken as identified as an Amendment to the Proposal within the MPW Stage 2 RtS. This design change is only relevant to a minor extent at a Concept level and therefore a clarification has been included to identify that the Amended Modification Proposal would no longer involve works on the ABB site (refer to Section 1.2 of this SRtS for further information).

² This refers to specific additional consultation undertaken by SIMTA with agencies in addition to the exhibition of the MPW Concept Modification RtS (which consulted with all relevant stakeholders).

3 OVERVIEW OF SUBMISSIONS

Submissions were received from government agencies and the community, including special interest groups during the exhibition period of the MPW Concept Modification RtS. The primary objective of this SRtS is to collate, analyse and respond to the submissions received during the exhibition of the MPW Concept Modification RtS.

An overview of the submissions and a summary of the process undertaken so that the submissions have been accurately responded to is provided below.

3.1 Submissions Received

Submissions were received from a total of seven government agencies, including:

- EPA
- OEH
- NSW Heritage Council
- Department of Industry and Resources
- Department of Industries
- Fairfield City Council
- Liverpool City Council
- TfNSW

In addition to these agency submissions, DP&E received a total of 194 submissions from community members, landowners and special interest groups. Of the 194 submissions 75% were from residents in the Liverpool Local Government Area (LGA) and 18% of submissions were from residents from suburbs in the Campbelltown, Bankstown, North Shore and Parramatta LGA's. The remaining 7% of submissions did not provided a location.

Figure 3-1 highlights the distribution of submissions across suburbs within the Liverpool LGA, with the majority (46%) received from residents located in Wattle Grove, the suburb located directly east of the MPW site. Moorebank (the suburb which the MPW site is within) had the second highest number of submissions (27%). Other suburbs from which submission were received include Chipping Norton (to the north- 8%), Casula (to the west- 7%), Holsworthy (to the south-east- 6%) and Hammondville (to the south-east- 4%). Submissions received from Hinchinbrook, Prestons and Sadlier made up the remaining 2% combined.

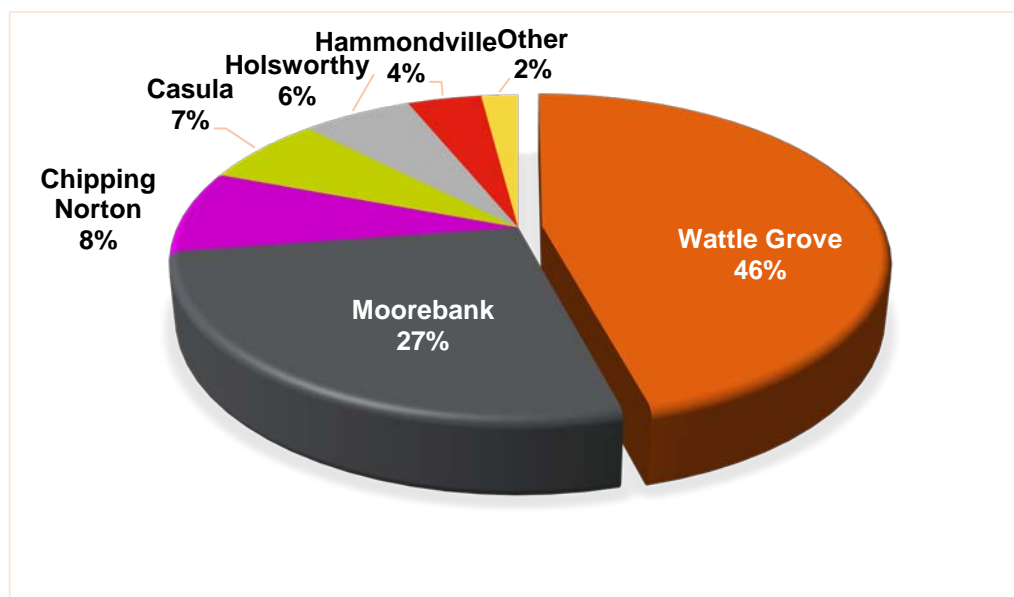


Figure 3-1 Location of community submissions from Liverpool LGA

3.2 Submission Response Methodology

3.2.1 Government Agencies and Local Councils

As outlined in Section 3.1, a total of seven government agencies or local councils provided submissions on the Amended Modification Proposal. Each submission varied in terms of the number and type of items raised for consideration, depending on the function/responsibility of the agency. Several submissions raised issues that relate specifically to the MPW Stage 2 Proposal, and are not directly relevant to the Amended Modification Proposal. Notwithstanding these have been addressed and further detail provided, where relevant. Other submissions identified that the MPW Concept Modification RtS addressed their comments and did not raise any further comments (Department of Industry, Heritage Council).

Each agency submission was reviewed and either transcribed in full, or summarised to identify the key points.

The submissions were then provided to the SIMTA technical specialist team (where relevant) for consideration and preparation of a response. Where additional reporting was prepared, it has been provided as an appendix to this SRtS.

3.2.2 Community

The community submissions were summarised into key aspects, issues and sub-issues using the reference number assigned to each submission by DP&E. The process of identifying this detail was iterative, utilising three rounds of review to capture each level of detail – key aspects, issues and sub-issues. Each submission was given a reference number, allowing analysis of submissions at an issue and aspect level.

Summary of Community Comments

Section 5 of this SRtS provides summary and analysis of the submissions received from the community.

Each submission received has been examined in detail to identify and understand the issues raised in the submission. The content of each community submission was

reviewed and categorised according to the aspect (eg traffic) and issue (eg congestion) and sub-issue (eg congestion on Moorebank Avenue). The issues raised in each submission have been extracted and collated and have been presented as a summary of the specific issues raised by individual submissions. Each community submission may have raised a number of issues. All issues raised within community submissions (where relevant to the Amended Modification Proposal) have been responded to.

A table showing all of the aspects, issues and sub-issues raised by the community, by their reference number (assigned by the DP&E) is provided within Appendix A of this report.

Many submissions received from the community expressed concerns that are out of the scope of the Amended Modification Proposal. Section 3.4 of this chapter provides clarity on the submissions that were considered to be out of scope.

The aspects identified in the submission analysis are outlined in Table 3-1 and Figure 3-2.

Table 3-1 Summary of aspects identified in community submissions

Aspect	No. of submissions raising aspect	% of submissions raising aspect
Traffic and Transport	85	36%
Noise	26	11%
Air	21	11%
Health	38	17%
Natural Environment	61	22%
Planning Process	49	16%
Economics	24	10%
Community	64	29%
Flora & Fauna	12	6%

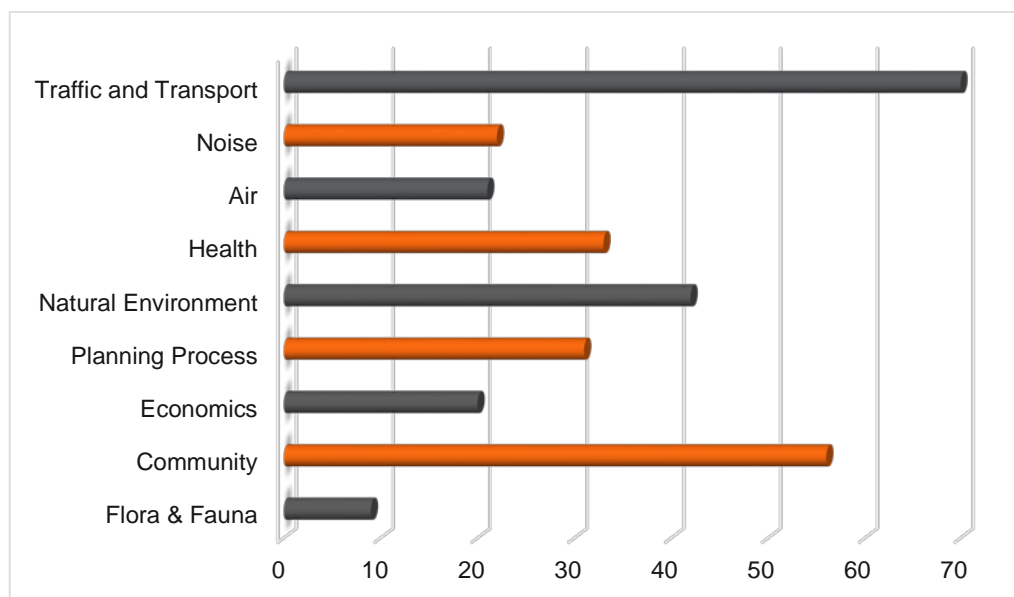


Figure 3-2 Breakdown of aspect by no. of submissions

3.3 Summary of Community Comments

3.3.1 Key Issue Analysis

Table 3-2 shows a summary of all the issues that were raised by the community during the public exhibition of the report.

Table 3-2 Summary of key issues raised by the community

Aspect	Issue	No. of submissions raising issue
Traffic and Transport	Congestion/Capacity	57
	Road infrastructure	8
	Assessment	4
	Safety	14
	Use of local roads	2
Noise	General	2
	Assessment	2
	Mitigation	17
	Operational noise	2
	Construction noise	1
Air	Air quality / pollution	15
Health	Pollution / air quality	15

Aspect	Issue	No. of submissions raising issue
	General	7
	Sleep disturbance	2
	Effects of particulate matter	2
Natural Environment	Impacts on local river systems	11
	Fill	11
	General environment	9
	Flooding	9
	Visual	4
	Aboriginal/European heritage	2
	Bushfire	1
	Pollution	1
Planning Process	Approvals/applications	13
	Combined project/Modifications	7
	General	6
	MPW Modification 1	5
	Environmental Management Documents	4
	Technical Studies	4
	MPE Stage 2 Application	3
Economics	General	8
	Reduction in property prices and compensation	5
	Cost of Project	4
Community	Impacts to community and lifestyle	30
	Consultation	9
	Social	4
	Safety	3
Flora & Fauna	General	7

Aspect	Issue	No. of submissions raising issue
	Impacts to native species	3
Out of scope	Various	125

Key Aspects

A summary and analysis of the three most important aspects from a community perspective has been provided below.

Traffic and transport

As shown above, traffic and transport has been identified by the community as being the key aspect for the Amended Modification Proposal. The submissions raised were generally related to the additional traffic movements posed by the Amended Modification Proposal and the potential impacts this would have on the surrounding road infrastructure.

The two most frequently raised issues identified within the traffic and transport aspect are:

- Congestion / Capacity – general concerns about congestion associated with the traffic movements generated by the Amended Modification Proposal
- Road infrastructure – existing road infrastructure surrounding the MPW site is unable to service an increase in vehicle movements for the Amended Modification Proposal.

Figure 3-3 highlights the breakdown of all issues raised by the community in relation to traffic and transport.

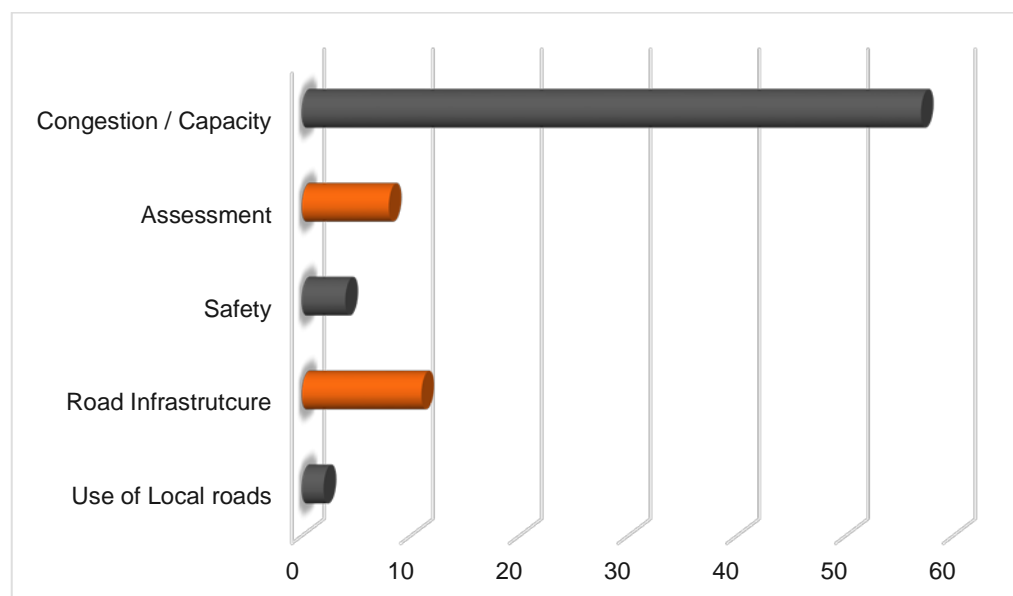


Figure 3-3 Traffic and transport key issue breakdown by no. of submissions

Community

Impacts to the community of surrounding suburbs to the MPW site were identified by the community as the second most important key aspect. The submissions raised were generally concerned with the impacts the Amended Modification Proposal would have on the quality of lifestyle and the impact on households.

The two most frequently raised issues identified within the community aspect are:

- Impacts to community and lifestyle – general concerns that the Amended Modification Proposal would impact on households, particularly those with children, and that the character of the area would be changed
- Consultation – concerns that the consultation process conducted has been insufficient and that SIMTA has not been listening to the community's voice.

Figure 3-4 highlights the breakdown of all issues raised by the submissions in relation to community.

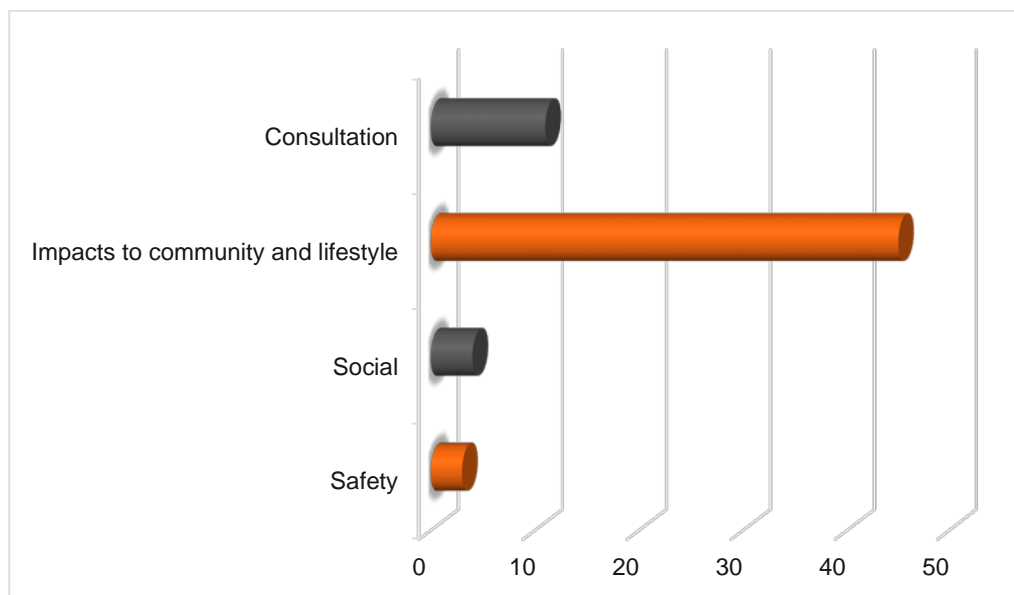


Figure 3-4 Community key issue breakdown by no. of submissions

Natural Environment

The third most prominent aspect raised by the community related to potential impacts to the natural environment as a result of the increased works included in the Amended Modification Proposal. Many submissions expressed concern that the river systems would be greatly impacted by the Amended Modification Proposal.

The most frequently raised issues identified within the natural environment aspect are:

- Impact on local river systems – concerns that the Amended Modification Proposal will negatively impact South-West river systems in particular damage and degradation to the Georges River
- Importation of fill – concerns that the fill would arrive at the Amended Modification Proposal site untested and pose a hazard to the native specimens and soil in the local area. Concerns that the importation of fill is excessive and not necessary given the land already on site.
- General environment – concerns that the Amended Modification Proposal would result in impacts to the surrounding environment generally.

- Impacts to flooding –concerns that the assessment has not considered the impacts to / from flooding from construction and operation of the Amended Modification Proposal.

Figure 3-5 illustrates the breakdown of all the issues raised by the community regarding Natural Environment.

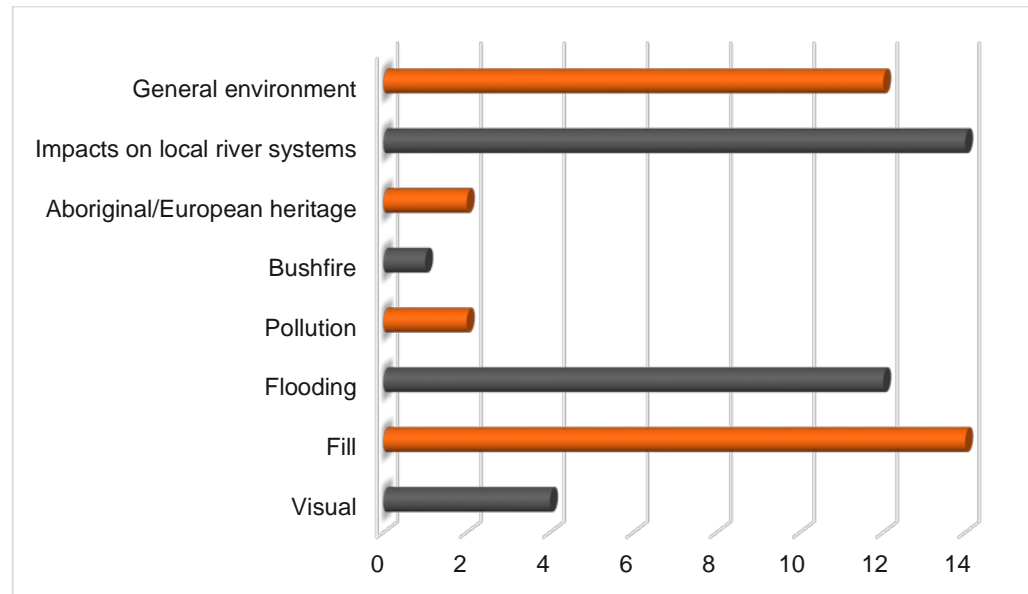


Figure 3-5 Natural environment key issue breakdown by no. of submissions

3.4 Other submissions

The majority of the submissions on the Amended Modification Proposal included issues that are not directly attributable to the Amended Modification Proposal. Of the 194 unique submissions that DP&E received, 180 submissions (92%) included an issue that was considered to not fall directly within the scope of the Amended Modification Proposal. These concerns were primarily related to site suitability and strategic justification of the overall MPW Project. The most frequent out-of-scope issues raised in submissions included:

- Object to the project at this location
- The location of the intermodal is unsuitable and should be located elsewhere such as near the new Airport in Badgerys creek, Chullora, Eastern Creek, off the M7 or to the north or south of Sydney.
- Project should be relocated where it can achieve more sustainable growth for the city and not bottleneck the community
- Most politicians live in the Northern suburbs and thus they won't let such a facility be built there
- The intermodal should be built elsewhere and the site should be developed for alternative uses.

The out of scope issues raised have been sufficiently addressed within earlier approval documents and Response to Submissions Reports. Consideration of site suitability and the strategic justification of the MPW Project has been provided in the MPW Concept Plan Approval.

4 RESPONSE TO GOVERNMENT AGENCY SUBMISSIONS

The following Local and State government authorities provided further responses as part of the public exhibition of the MPW Concept Modification RtS:

- Office of Environment and Heritage (OEH)
- Department of Primary Industries (DPI)
- Environment Protection Authority (EPA)
- Heritage Council
- Department of Industry (Resources and Energy)
- NSW Health
- Liverpool City Council (LCC)

Several submissions raised issues that relate more specifically to the MPW Stage 2 Proposal and are not directly relevant to the Amended Modification Proposal. Notwithstanding this we have addressed them and provided further detail where relevant.

Other submissions identified that the MPW Concept Modification RtS addressed their comments and did not raise any further comments (Department of Industry and Heritage Council).

4.1 Office of Environment and Heritage

A formal submission comprising a letter (dated 1 March 2017) was received from OEH. The comments provided are summarised below.

- **Height of stockpiled fill layer:** The OEH submission noted that the proposed permanent fill layer will be approximately one metre high, overtopped by a temporary stockpile of fill up to six metres, but not up to 10 metres as stated in the MPW Concept Modification Report.
- **Biodiversity impacts of stockpiles:** The OEH submission recommended further assessment be undertaken to confirm the location on the proposed imported fill and that it will not indirectly impact on the biodiversity values of the conservation area. The lack of clarity on the location of the stockpiles and the fact they may be in place for up to three years brings into question the conclusion in the MPW Concept Modification RtS that the importation of clean general fill during construction of the MPW Stage 2 Proposal would not result in an impact on biodiversity.
- **Targeted flora surveys:** In their submission, OEH recommended additional targeted flora surveys should be undertaken within 'priority area 2' of the MPW site given the threatened species found during recent surveys of the adjoining boot land south of Anzac Creek (e.g. *Hibbertia puberula* and *Hibbertia fumana*). These surveys should be undertaken if the importation of fill results in the clearing of any vegetation even if the clearing is permitted by the existing concept plan approval.

Height of stockpiled fill layer

The OEH submission noted that the proposed permanent fill layer will be approximately one-metre high, overtopped by a temporary stockpile of fill up to six metres.

This comment provided by OEH regarding the proposed height of stockpiles is noted. Section 3.2.3 and 3.2.4 of the MPW Concept Modification Report (Arcadis, 2016) stated that clean general fill material, required for future stages of the MPW Project, would be temporarily stockpiled within the primary earthworks area, at a maximum height of up to 10 metres above the final site levels.

Drawing number MCPN-ARC-CV-DWG-01111 (Appendix D of the MPW Concept Modification Report) clarifies this limit, specifying boundaries and cross sections of the primary earthworks area, and confirming that there would be a permanent fill layer of approximately one metre underlying a temporary stockpiled fill layer of six metres high in some areas (below the maximum 10 metre height). This temporary stockpiled fill would ultimately be spread out across a 150-hectare area (refer to Section 1 and Section 6 of the MPW Concept Modification RtS report for justification for fill importation).

Biodiversity impacts of stockpiles

In their submission, OEH requested further clarity regarding the location of stockpiles of general clean fill to be imported under the Amended Modification Proposal, and further assessment to support the conclusion that the Amended Modification Proposal would not result in impacts to the biodiversity values of the conservation area.

The locations of stockpiles during construction would not result in any greater impacts to biodiversity than that of permanent operations. As stated in Section 6.3 of the MPW Concept Modification RtS, the locations for bulk earthworks stockpiling would be predominantly within the pre-construction bulk earthworks stockpiling area outlined in Figure 6-3 of the MPW Concept Modification RtS, however other isolated stockpiles may also be located throughout the construction footprint. As included within Section 6 of this SRtS, erosion and sediment controls, based on Blue Book guidelines (Landcom, 2004) would be implemented in accordance with the Soil and Water Management Plan to be prepared for the site.

The revised environmental mitigation measures included in Table 6-1 of this SRtS includes the following measure relating to the management of stockpiles and the establishment of exclusion zones to protect the biodiversity values of the conservation area: *Stockpiling areas would be located no further west than the toe of the embankment on the western extent of the construction area excluding OSD outlet basin areas, or no closer than 100m from the George's river's eastern bank, whichever is greater.*

Targeted flora surveys

In their submission, OEH recommended additional targeted flora surveys of the MPW site be undertaken given the threatened species found during recent surveys of the adjoining boot land³ south of Anzac Creek (e.g. *Hibbertia puberula* and *Hibbertia fumana*).

While the discovery and need for further investigation with regard to the new species is noted and supported, it is also important to note that the Amended Modification Proposal would be undertaken during construction of Stage 2 of the MPW Project, and would not result in any change to impacts to biodiversity identified in the assessment provided within the MPW Concept EIS.

As outlined in the Biodiversity Assessment Report (refer to Appendix G of the MPW Stage 2 RtS) additional field assessment was undertaken on 9 and 14 February 2017

³ The Boot land is a term used to describe Lot 4, DP 1197707. The lot is residual Commonwealth Land, located to the east of the MPE site between the site boundary and the Wattle Grove residential area.

and 14 March 2017. Targeted searches for threatened plant species within areas of suitable habitat were conducted following the discovery of *Hibbertia puberula* subsp. *puberula* (listed as Endangered under the TSC Act) and *Hibbertia fumana* (a species previously presumed to be extinct, and now provisionally listed as critically endangered under the TSC Act) on the Boot land east of Moorebank Avenue in late 2016. Potential habitat for *Hibbertia puberula* subsp. *puberula* was identified on the MPW site, which includes Amended Modification Proposal footprint. Potential habitat for *Hibbertia fumana* does not appear to be present on the MPW site, but the species is associated with Hard-leaved Scribbly Gum – Parramatta Red Gum heathy woodland of the Cumberland Plain (OEH 2017), which is mapped on the MPW site. In accordance with the precautionary principle, targeted searches for threatened plant species included both species of *Hibbertia*.

The 2017 targeted surveys identified a population of *Hibbertia puberula* subsp. *puberula* in the east of the MPW site (refer to Figure 4-1). The other threatened plant species on the development site, *Persoonia nutans*, *Acacia bynoeana* and *Grevillea parviflora* subsp. *parviflora*, were also targeted and recounted. *Grevillea parviflora* subsp. *parviflora* was surveyed using stem counts instead of counts of individuals, to maintain consistency with surveys undertaken on the proposed biodiversity offset site.

The 2017 targeted survey recorded 333 stems of *Grevillea parviflora* subsp. *parviflora* and 16 *Persoonia nutans* in approximately the same locations as presented in the ecological assessments for the MPW Concept EIS (PB, 2014) and MPW Concept RtS (PB, 2015). *Hibbertia puberula* subsp. *puberula* was recorded in two of the larger patches of Hard-leaved Scribbly Gum - Parramatta Red Gum heathy woodland in the central eastern parts of the MPW site, however, these additional threatened species is located on land which has been previously approved and any potential impacts to these individuals is not related to the Amended Modification Proposal.

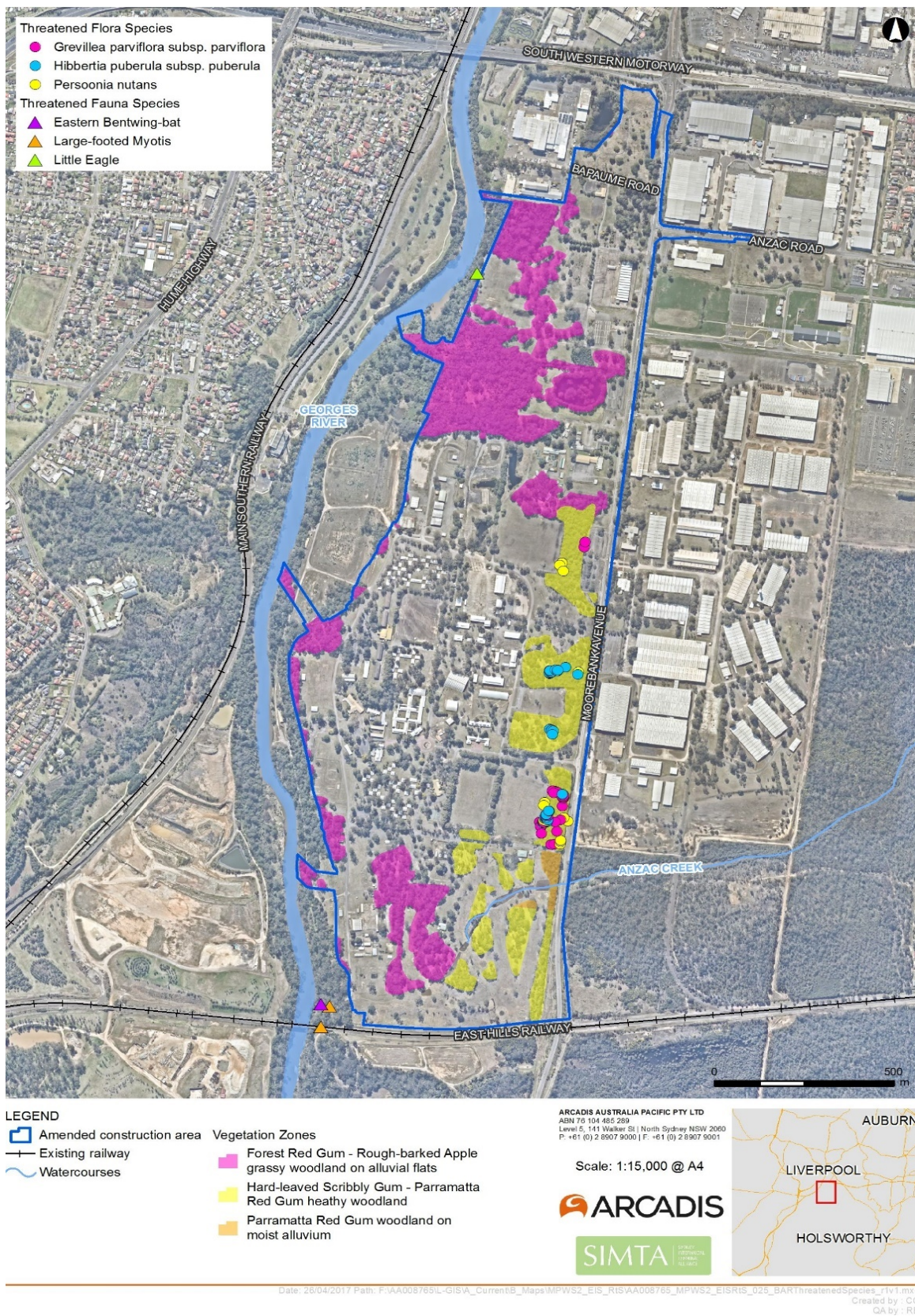


Figure 4-1: Targeted flora survey results 2017

4.2 Department of Primary Industries

A formal submission comprising a letter (dated 23 February 2017) was received from DPI. Several comments were made, as summarised below.

- **Riparian zone impacts:** In their submission, DPI stated that two additional OSDs in the south western and northern portions of the site would result in gaps in riparian vegetation significantly larger than those outlined in the MPW Concept Approval. Alternative options to the basin located in the south western portion of the site should be considered to reduce potential impacts to riparian connectivity.
- **Drainage channel widths:** DPI queried that if the south western basin is necessary the proponent should ensure that the detailed design includes:
 - Further detail and justification of the width of drainage channel outlets to be used during construction.
 - Investigate potential options to minimise the outlet width and the potential impacts on the river bank profile and riparian connectivity.
- **Freshwater wetland impacts:** DPI requested further detail regarding whether the detention basin in the northern portion of the site is to discharge to Amiens Wetland and if so, assessment of the potential impact this could have on the hydrology of the wetland.
- **Scope of Construction Soil and Water Management Plan:** DPI requested that the Construction Soil and Water Management Plan (CSWMP) should include more detailed geological information from the Geotechnical Interpretative Report included with the MPW Stage 2 EIS regarding the groundwater conditions surrounding the Georges River. It was also requested that a definitive statement is provided about the groundwater monitoring program as no schedule or locations were presented in the MPW Stage 2 EIS.

Riparian zone impacts

DPI raised the following issue regarding riparian zone impacts associated with the MPW Concept Modification RtS:

- *Two additional OSDs in the south western and northern portions of the site would result in gaps in riparian vegetation significantly larger than those outlined in the MPW Concept Approval, and alternative options to the basin located in the south western portion of the site should be considered to reduce potential impacts to riparian connectivity.*

A comparison of Figures 6-1 (MPW Concept Layout) and 6-2 (MPW Amended Modification Proposal Layout) of the MPW Concept Modification RtS outlines the addition of a OSD basin in the northern portion of the MPW site, and rearrangement (and resizing) of the basin in the south-western portion of the site compared to the MPW Concept Approval. The additional northern OSD would discharge to the adjacent Amiens Wetland, while the south western OSD would require an outlet channel through the riparian corridor and associated conservation area. These aspects are discussed and justified in terms of the Amended Modification Proposal in Section 6.5.5 of the MPW Concept Modification Report. Of key importance is that the addition and rearrangement of these two basins on the MPW site would not result in any additional impact to riparian vegetation, when compared to the Concept Approval Layout as shown through comparison of Figures 6-1 and 6-2 of the MPW Concept Modification RtS. The rearrangement of approved uses, including OSDs, does not increase the overall detention volume, but rather re-distributes the stormwater runoff to additional locations to allow for improved function of the stormwater system upstream of the OSDs in line with the adjusted building formation level. Where

possible, the discharge from these OSDs replicate existing drainage flows, and are consistent with the MPW Concept Approval.

Drainage channel widths

DPI raised the following issues regarding the riparian connectivity associated with the MPW Concept Modification RtS:

- *if the south western basin is necessary the proponent should ensure that the detailed design includes:*
 - *Further detail and justification of the width of drainage channel outlets to be used during construction.*
 - *Investigate potential options to minimise the outlet width and the potential impacts on the river bank profile and riparian connectivity.*

The MPW Concept Approval identifies the need for, and assesses the impact of four drainage channels on the MPW site within the conservation area, including one near the now proposed south western OSD. Further, the MPW EPBC Approval (No. 2011/6086) included a footprint that considers the installation of these channels and associated vegetation removal.

Despite outside the scope of the Amended Modification Proposal, as noted in Section 6.6 of the MPW Stage 2 EIS, SIMTA undertook detailed design review to challenge the design assumptions used for the OSD outlets in an attempt to minimise impacts on the conservation area, where possible. While the 10 metre width allowed for drainage channel outlets in the MPW Concept Approval was found to be inadequate, their design has been refined with a view to minimising erosion impacts on the river bank and reducing the footprint, and therefore the extent of clearing required. Further consideration has also been given to the design and location of the drainage system, including the need for a covered drain, in addition to the drainage channels, as identified in the MPW Stage 2 RtS (refer to Sections 6 and 7, and Appendix H of the MPW Stage 2 RtS for revised widths). It is considered that the refined drainage outlet channel outlets would not significantly impede fauna movement, provided that connectivity is enhanced using strategic revegetation and other fauna habitat features, such as rocks, to provide cover in these areas, as per mitigation measure 4U from the MPW Stage 2 EIS (Refer to Section 22 of the MPW Stage 2 EIS).

Freshwater wetland impacts

DPI raised the following issues regarding impacts to the wetland associated with the MPW Concept Modification RtS:

- *DPI requested further details regarding whether the detention basin in the northern portion of the site is to discharge to Amiens Wetland and if so, assessment of the potential impact this could have on the hydrology of the wetland.*

The Amended Modification Proposal does not seek modification to any aspect of the drainage design identified within the MPW Concept Approval. Initial 'environmental' low flow discharges from the proposed northern OSD would flow to the Amiens Wetland, with less frequent (larger storm event) discharges from the OSD bypassing the wetland. This approach would maintain water balance to the wetland.

As outlined in the Stormwater and Flooding Environmental Assessment (refer to Appendix H the MPW Stage 2 RtS), additional site survey in the northern area of the Proposal site (to the north and south of Bapaume Road) has informed a revised comparison of the DRAINS model for existing and post-development flows in this northern portion of the MPW site (and a slightly reduced construction boundary associated with the Amended Modification Proposal – refer to Section 1 of this SRtS). A water balance assessment was also undertaken for the Amiens Wetland.

The results from this investigation indicate that initial 'environmental' low flow discharges from proposed Basin 4 into the (Amiens) wetland, would replenish the wetland and maintain water balance, while less frequent storm event discharges from Basin 4, bypassing the wetland, would mitigate potential flood impacts on neighbouring areas.

Scope of Construction Soil and Water Management Plan

DPI raised the following issues regarding impacts to the wetland associated with the MPW Concept Modification RtS:

- *DPI requested that the Construction Soil and Water Management Plan (CSWMP) should include more detailed geological information from the Geotechnical Interpretative Report included with the MPW Stage 2 EIS regarding the groundwater conditions surrounding the Georges River. It was also requested that a definitive statement is provided about the groundwater monitoring program as no schedule or locations were presented in the MPW Stage 2 EIS.*

The reference to the CSWMP and groundwater setting at the site within the submission appears to relate to the MPE Stage 1 RALP works, which includes construction of the Georges River bridge, rather than to the Amended Modification Proposal, which does not propose any additional impacts to riparian areas or groundwater when compared to the MPW Concept Approval. Specific references to the CSWMP, a sub-plan to a staged CEMP for Stage 2 of the MPW Project, is not considered within the scope of the Amended Modification Proposal. It is noted nonetheless, that the Geotechnical Information Report prepared for the MPW Stage 2 EIS (refer to Appendix S of the MPW Stage 2 EIS) contains geological cross sections showing subsurface conditions from the MPW site to within the conservation area beside the Georges River.

Further detail regarding the Groundwater Monitoring Plan, proposed as part of Stage 2 of the MPW Project is considered outside the scope of the Amended Modification Proposal, and would be provided as part of the MPW Stage 2 Application.

4.3 Environment Protection Authority

A formal submission comprising a letter (dated 27 February 2017) was received from the EPA. The following comments were made.

- **Environmental management measures:** The proposed management measures outlined in the Amended Modification Proposal adequately address the key environmental issues of noise and air quality.
- **Appropriate Regulatory Authority (ARA):** Liverpool City Council is the Appropriate Regulatory Authority for the project under the *Protection of the Environment Operations Act 1997*, but the EPA has agreed to assist Council by providing comments and recommendations in relation to the key environmental issues of noise and vibration, and air quality.
- **Suitability of imported fill material:** An EPA accredited site auditor should be engaged to approve the suitability of fill material imported to the site. Imported fill material is required to meet the EPA's Resource Recovery Guideline.

Environmental management measures

The EPA's comments regarding the adequacy of the environmental management measures are noted.

Appropriate Regulatory Authority

The EPA submission stated that Liverpool City Council is the Appropriate Regulatory Authority (ARA) for the project under the *Protection of the Environment Operations Act 1997* (POEO Act), but that the EPA has agreed to assist Council by providing comments and recommendations in relation to the key environmental issues of noise and vibration, and air quality.

The decision on the ARA for the Project is a matter for the Department of Planning and Environment (DP&E) and the EPA. Previous discussions with DP&E have indicated that they will be the ARA for the Project. We defer this matter to DP&E and the EPA for further consideration during assessment.

Suitability of imported fill material

The EPA submission recommends that an EPA accredited site auditor should be engaged to approve the suitability of fill material imported to the site. Imported fill material is required to meet the EPA's Resource Recovery Guideline.

The MPW Concept Modification Report and MPW Concept Modification RtS indicates that imported fill material would be "clean general fill" that meets the definition of Virgin Excavated Natural Material (VENM) and Excavated Natural Material (ENM) under the POEO Act or the NSW EPA's resource recovery orders and exemptions. Imported material would meet all chemical and other material requirements as specified in the relevant resource recovery order.

4.4 NSW Heritage Council

A formal submission comprising a letter (dated 25 January 2017) was received from the Heritage Division of OEH, as delegate of the NSW Heritage Council. The submission advised that the MPW Concept Modification RtS adequately responded to the NSW Heritage Council's previous comments.

4.5 Department of Industry (Resources and Energy)

A formal submission comprising a letter (dated 20 December 2016) was received from the Department of Industry (Resources and Energy). The submission advised that the Geological Survey of New South Wales (GSNSW) has no mineral resource concerns regarding the Amended Modification Proposal as there are no current mineral, coal or petroleum titles over the site. The Department's advice that the Amended Modification Proposal should have no impact upon mineral, coal or petroleum resources is noted.

4.6 NSW Health

NSW Health advised that the issues raised in their submission dated 4 July 2015 on the MPW Concept Proposal and Stage 1 Early Works RtS, should be considered in relation to the Amended Modification Proposal. Comments relating to aspects not considered within the scope of the Amended Modification Proposal assessment, including operational locomotive impacts, fuel storage onsite and water recycling have not been included within this section, but have been addressed within the MPW Stage 2 RtS as appropriate. Several comments considered relevant to the Amended Modification Proposal were provided, as summarised below.

- **Air quality:** NSW Health raised concern that although the predicted health impacts from operation of the MPW site are generally considered to be low, there is the potential for health risks associated with exposure to particulates in adjacent commercial/industrial workplaces, and mitigation measures to reduce this risk should be detailed further.
- **Traffic congestion:** NSW Health commented that the predicted health outcomes relating to traffic congestion should be positive as long as all the proposed mitigation measures are implemented.
- **Human health risk:** As part of wider ongoing monitoring and evaluation processes, monitoring data for air quality, noise and traffic would be regularly reviewed against the guidelines developed in the specialist studies supporting this EIS, as they are based on protecting the health of the community. Should exceedances be identified in these key indicators as a result of the Project, then a further and more targeted monitoring and management program would be developed as required.

Air quality

NSW Health raised concern that although the predicted health impacts from operation of the MPW site are generally considered to be low, there is the potential for health risks associated with exposure to particulates in adjacent commercial/industrial workplaces, and mitigation measures to reduce this risk should be detailed further.

Section 7.1.7 of the MPW Concept Modification RtS provides an assessment of air quality impacts associated with the Amended Modification Proposal during operation, including those associated with particulates. The results of this assessment indicate that the Amended Modification Proposal overall would result in no additional exceedances in relevant air quality criteria, and overall negligible operational air quality impacts above that identified within the MPW Concept Approval.

On the basis of this assessment, further progressive assessment as part of the staged approvals process, and mitigation measures provided for the MPW Concept Approval, including Revised Environmental Management Measures 10V-10AC (refer to Section 6 of this SRtS), no further mitigation measures are considered necessary to minimise exposure to particulates in the adjacent workplaces with regard to the Amended Modification Proposal.

Traffic congestion

NSW Health commented that the predicted health outcomes relating to traffic congestion should be positive as long as all the proposed mitigation measures are implemented. Revised mitigation measures from the MPW Concept Approval (refer to REMMs, Section 7 of the MPW Concept SRtS), and additional measures proposed in relation to the Amended Modification Proposal (refer to Section 6 of this SRtS) would be implemented to manage environmental impacts, including those related to traffic congestion.

Human health risk

NSW Health indicated support of Revised Environmental Management Measure 17A - as part of wider ongoing monitoring and evaluation processes, monitoring data for air quality, noise and traffic would be regularly reviewed against the guidelines developed in the specialist studies supporting this EIS, as they are based on protecting the health of the community. Should exceedances be identified in these key indicators as a result of the Project, then a further and more targeted monitoring and management program would be developed as required. This mitigation measure has been retained in Section 6 of this SRtS.

4.7 Liverpool City Council

A formal submission comprising a letter (LCC, dated 24 February 2017) and report (Cardno, dated 20 February 2017) was received from Liverpool City Council (LCC) regarding the MPW Concept Modification RtS. Comments raised have been summarised below and addressed in detail. Further responses regarding the LCC submission made for the MPW Concept Modification Report (Cardno, 2016) have been provided in Appendix B of this SRtS.

- **Categorisation of submission responses:** The LCC submission raises the following queries with regard to the statistical categorisation approach as presented within Section 3 of the MPW Concept Modification RtS:
 - The statistics raised focus only on community submissions and are not a true representation of key issues
 - The percentages attributed to these concerns together add to 244%, indicating that various submissions must be counted as displaying multiple options, which raises the question as to how the categorisation was undertaken
 - The MPW Concept Modification RtS does not sufficiently address comments previously raised by LCC for the MPW Concept Modification Report (submission raised August, 2016)
- **Statutory Planning:** The LCC submission states that the MPW Concept Modification RtS does not address previous comments in sufficient detail raised by LCC for the MPW Concept Modification Report (submission raised August, 2016), and that the MPW Concept Modification RtS does not provide further justification for a proposed Section 96 (2) modification.
- **Traffic:** The following key issues were raised by the LCC submission:
 - The MPW Concept Modification RtS does not adequately address concerns raised within the previous LCC submission (Cardno, 2016)
 - Inconsistencies in modelling software versions across different MPW traffic studies covering the same area.
 - SIDRA files are not provided in the MPW Concept Modification RtS documentation
 - Inconsistencies in intersection performance modelling results for the same intersection across two separate assessments
 - LCC commented “The MPW Concept Modification RtS document indicates that further assessment is not required as an interface has previously been assessed as part of the cumulative assessment between the MPW and MPE sites. It appears that assessment of the cumulative traffic generation from MPW and MPE was undertaken for the operational conditions. It is not clear however, if a similar approach has been considered for the construction traffic”.
 - The additional heavy vehicles moving between both IMTs transporting freight to the two warehousing facilities have not been adequately assessed.
 - LCC commented “The MPW Concept Modification RtS document indicates that an upgraded Moorebank Avenue / Anzac Road intersection is proposed to provide access to the MPW site and cater for traffic generated by Stage 2 of the MPW Project. It is not clear if this assessment has considered the cumulative impacts of both MPW and MPE sites. Furthermore, the intersection performance results presented differ from those presented in the MPE Stage 2 Operational Traffic and Transport Impact Assessment”.

- **Amenity and Human Health:** The following issues were raised by the LCC submission:
 - The MPW Concept Modification RtS does not adequately address key air quality and noise and vibration concerns previously raised by LCC through the Cardno (2016) report, submitted previously in response to the MPW Concept Modification Report.
 - LCC commented “As noted by the EPA’s response to their review of the MPW Concept EIS a more detailed and comprehensive assessment of human health impacts for the Amended Modification Proposal is required to ensure mitigation of potential impacts”.
 - It is recommended further noise modelling is undertaken to more clearly outline the potential impacts associated with the following Amended Modification Proposal components:
 - Changes to approved function and re-arrangement of existing approved uses (freight village, truck parking and OSDs)
 - Interaction between MPW and MPE sites
 - Clarification is sought regarding the Appropriate Regulatory Authorities (ARA) for the MPW Project.
- **Land Contamination:** LCC requested that further high level commentary regarding the unexpected finds protocol should be included, with specific reference to risk areas on the site including unexploded ordinance and earthworks in areas of contamination.
- **Visual Amenity:** LCC raised concern that the VIA undertaken for the Amended Modification Proposal within the MPW Concept Modification RtS does not adequately assess the visual impacts generated by increased building heights at residences in Casula, Carrol Park and the Casula Powerhouse. LCC request a photomontage be provided to illustrate the visual impacts created by changes in building heights.
- **Additional Amendments:** LCC commented that the Amended Modification Proposal has included a number of Proposal additions not afforded the same scrutiny as that afforded to the initial Concept Plan Modification, stating that this approach lacks transparency. It is recommended these additional components be removed from the Amended Modification Proposal, with a comprehensive EIS prepared to take into account both Moorebank Precinct sites in a site-wide master planned approach.

A detailed response to issues raised in the LCC submission is provided in the following sections.

Categorisation of submission responses

The LCC submission raised concerns with several aspects of the statistical categorisation approach of the MPW Concept Modification RtS, including:

- *The statistics raised focus only on community submissions and are not a true representation of key issues*

It is clearly stated in Section 3.2.2 and 3.2.3 of the MPW Concept Modification RtS that the issue analysis represents a summary of all issues raised by the community, and are thus considered to provide a true representation. Statistical categorisation of community issues is provided to outline how community concerns have been categorised and responded to in Section 5 of the MPW Concept Modification RtS report, and are not intended to provide a holistic representation of key issues raised in the exhibition process (inclusive of agency submissions).

Furthermore, the approach and methodology of submissions responses for the MPW Concept Modification RtS, including statistical categorisation, are consistent with those undertaken for the MPW Concept Approval (SSD 5066 – refer to MPW Concept RtS).

- *The percentages attributed to these concerns together add to 244%, indicating that various submissions must be counted as displaying multiple options, which raises the question as to how the categorisation was undertaken.*

The sum of the attributed percentages add to approximately 244%, as noted by LCC in their submission. This percentage is indicative that on average each submission raised two to three issues. The method of categorisation used is a standardised approach used for the categorisation of submissions received for SSD Projects (in general) and has been previously undertaken for the MPW Concept Approval (SSD 5066) and MPE Stage 1 Approval (SSD 14-6766) in consultation with DP&E. The method is clearly described in Section 3.2.2 of the MPW Concept Modification RtS, with supporting categorisation input provided in Appendix A of the MPW Concept Modification RtS. This approach has also been undertaken for issue categorisation for this report (refer to Section 2 of this SRtS).

- *The MPW Concept Modification Report does not address in sufficient detail comments previously raised by LCC for the MPW Concept Modification Report (submission raised August, 2016)*

The MPW Concept Modification RtS considered key issues raised by LCC in reference to the MPW Concept Modification Report (refer to Section 4.5 of the MPW Concept Modification RtS). Further detail regarding specific items raised within the supporting information to the LCC submission (August, 2016) is provided in Appendix B of this SRtS (tabularised response).

Statutory Planning

The LCC submission raised the following issue:

- *The MPW Concept Modification RtS does not address previous comments in sufficient detail raised by LCC for the MPW Concept Modification Report (submission raised August, 2016) regarding statutory compliance (modification justification). In addition, the MPW Concept Modification RtS does not provide any further justification for a modification.*

The MPW Concept Modification RtS considered key issues raised by LCC in reference to the MPW Concept Modification Report (refer to Section 4.5 of the MPW Concept Modification RtS). Further detail regarding submissions raised within the supporting information to the LCC submission (August, 2016) for the MPW Concept Modification Report, regarding statutory compliance, are provided in Appendix B of this SRtS (tabularised response).

Detailed justification was provided to support the Amended Modification Proposal. Section 1.6 of the MPW Concept Modification RtS provides an assessment of the Amended Modification Proposal compared with the MPW Project as approved under the MPW Concept Approval in consideration of the ‘*substantially the same development*’ test (as required by s96(2) of the EP&A Act). The assessment concludes that the Amended Modification Proposal would facilitate for the development of an intermodal terminal facility with the same IMT throughput limitations, warehousing GFA, freight village, truck parking and other ancillary development as provided within the MPW Concept Approval. Further, the assessment also concludes that the Amended Modification Proposal overall would not result in any additional environmental impacts that could not be adequately managed through the implementation of the Ministers Conditions of Approval (MCoA), the Revised Environmental Management Measures (REMMs) provided within the MPW Concept

Approval and additional mitigation measures provided in Section 8 of the MPW Concept Modification RtS (included in Section 6 of this SRtS).

This conclusion is based on the justification to support the Amended Modification Proposal provided in Section 6.5 of the MPW Concept Modification RtS, and detailed environmental assessment of Amended Modification Proposal components, provided within Section 7 of the MPW Concept Modification RtS. In summary, as a result of the outcomes of the comparison of the assessment of potential environmental impacts and mitigation measures of the development as currently approved under the MPW Concept Approval, and the development as proposed to be modified, it is considered that the Amended Modification Proposal would result in a development that is 'substantially the same' as the development as originally approved.

Traffic

The LCC submission raised a number of issues summarised above, including:

- *The MPW Concept Modification RtS does not adequately address concerns raised within the previous LCC submission (submission raised August, 2016)*

The MPW Concept Modification RtS considered key issues raised by LCC in reference to the MPW Concept Modification Report (refer to Section 4.5 of the MPW Concept Modification RtS). Further detail regarding issues raised within the supporting information to the LCC submission (August, 2016) for the MPW Concept Modification Report, including comments related to traffic and transport, are provided in Appendix B of this SRtS (tabularised response).

- *Inconsistencies in modelling software versions across different MPW traffic studies covering the same area.*

The LCC submission notes SIDRA 6 modelling software is used for the Traffic Impact Assessment prepared for the MPW Concept EIS (Technical Paper 1, 2014), while SIDRA 7 modelling software is used to analyse traffic scenarios for the MPW Concept Modification Report and MPW Concept Modification RtS (modelling undertaken in 2016), suggesting that a more rigorous approach would be to use the same version of the software.

The approach adopted considers the most updated software available at the time of assessment to be the most appropriate, in accordance with Roads and Maritime guidelines. The different versions of the same software (SIDRA) used for separate assessments is indicative of the different timeframes of when the respective assessments were undertaken, whereby the latest and more refined version of SIDRA at the time of the assessment was utilised (i.e. version 7 was released in 2016). The approach adopted considers Section 14.1.1 of the *Roads and Maritime Services (Roads and Maritime) Traffic Modelling Guidelines (version 1.0, February 2013)* where Roads and Maritime requires 'The latest version/update of SIDRA INTERSECTION should be used where possible.'

- *SIDRA files are not provided in the RtS documentation*

Providing assessment modelling files (such as SIDRA files) in planning approval documentation is not standard practice. This information, however, can be provided on request.

- *Inconsistencies in intersection performance modelling results for the same intersection across two separate assessments*

The LCC submission raises concern with intersection performance results from studies undertaken for the MPW Concept EIS (PB, 2014) and the MPE Stage 2 EIS (Arcadis, 2016). Despite these two assessments not directly relevant to the Amended Modification Proposal, the results of the MPW Concept EIS can be used to measure the degree of traffic impact attributable to the Amended Modification Proposal. The specific intersection referred to in the LCC submission (Moorebank Avenue / DJLU

Access) is incorrectly referenced. The Moorebank Avenue / DJLU access intersection, according to the PB (2014) predictions referenced in the MPW Concept Modification RtS, would perform poorly in the PM peak in 2016 and in the AM peak from 2029 which is considered generally consistent with other assessments. It is also noted that ongoing information obtained and used in subsequent assessments since the MPW Concept EIS (PB, 2014), including updated models and background traffic surveys, has provided more accurate intersection performance forecasts. As such, direct comparisons are not able to be made between the various assessment reports.

- *The RtS document indicates that further assessment is not required as an interface has previously been assessed as part of the cumulative assessment between the MPW and MPE sites. It appears that assessment of the cumulative traffic generation from MPW and MPE was undertaken for the operational conditions. It is not clear however, if a similar approach has been considered for the construction traffic*

This comment appears to be in reference to the construction traffic assessment for the Amended Modification Proposal (interaction between the MPW and MPE sites), for which the traffic impacts associated with interfacing have already been assessed as part of the MPW Concept EIS. Traffic impacts from construction activities associated with the Amended Modification Proposal (and overlapping activities anticipated for Stage 2 of the MPW Project) were assessed based on a cumulative traffic construction scenario which considered the peak construction period during overlap in works periods (refer to Section 7.1.1 of the MPW Concept Modification RtS). This scenario assumes that this peak would occur concurrently with MPE Stage 1 operation, and that the site access at Moorebank Avenue / Anzac Road is constructed. SIDRA modelling results for the peak construction scenario, as presented in Table 7-6 of the MPW Concept Modification RtS, indicate key intersections would operate at an acceptable level of service, with the implementation of previously identified mitigation measures (REMMS – refer to Section 8 of the MPW Concept Modification RtS).

- *The additional heavy vehicles moving between both IMTs transporting freight to the two warehousing facilities have not been adequately assessed.*

The Amended Modification Proposal would facilitate for the movement of vehicles from the MPW site to the MPE site, primarily for the transfer of containers between terminals and associated warehousing during operation. As outlined in Section 7.1.1 of the MPW Concept Modification RtS, operational traffic would use the southern part of Moorebank Avenue to interact with the MPE site however would not use Moorebank Avenue south of the southern extent of the MPE site.

This interaction between the two sites would commence from the operation of MPW Stage 2 Proposal and continue to future stages. An impact assessment based on the MPW Stage 2 Proposal, for the Moorebank Avenue / Anzac Road intersection has been provided in Section 7.1.1 of the MPW Concept Modification RtS. This intersection would be potentially affected by the additional movements, and this Stage is considered the most suitable, as it would include more traffic movements (alone, i.e. without a cumulative assessment) than Stage 3 of the MPW Project. The results of this assessment, as provided in Section 7.1.1 of the MPW Concept Modification RtS, indicate that an upgraded Moorebank Avenue / Anzac Road intersection, proposed as part of Stage 2 of the MPW Project, would adequately manage any additional impact associated with the Amended Modification Proposal.

- *The RtS document indicates that an upgraded Moorebank Avenue / Anzac Road intersection is proposed to provide access to the MPW site and cater for traffic generated by Stage 2 of the MPW Project. It is not clear if this assessment has considered the cumulative impacts of both MPW and MPE sites. Furthermore, the intersection performance results presented differ from those presented in the MPE Stage 2 OTTIA.*

The operational results provided in the MPW Concept Modification RtS within Section 7.1.1 are drawn from the OTTIA undertaken for Stage 2 of the MPW Project, and are reflective of performance of Stage 2 of the MPW Project only. A cumulative assessment, which assumes Stage 1 of the MPE Project is operational, is provided in Section 2.2.2 of the MPW Stage 2 RtS Revised OTTIA (refer to Appendix C of the MPW Stage 2 RtS). Results from the cumulative assessment indicate that the intersection would operate at an acceptable LOS in the AM and PM peak for both 2019 and 2029 with the upgraded intersection layout proposed.

Due to the fact that operational traffic modelling was not exclusively undertaken for the Amended Modification Proposal, queries relating to the method of assessment for these assessments is not considered within the scope of the Amended Modification Proposal. Despite this, the differences in the results questioned by LCC is explained primarily because the assumptions underpinning the two assessment scenarios are different. The MPE Stage 2 cumulative scenario includes three components (Stage 1 (Early Works) and Stage 2 of the MPW Project, and Stage 2 of the MPE Project), whereas the MPW operational scenario (extracted from the MPW Stage 2 OTTIA) considers only MPW Stage 2 and background traffic. Minor variations in LoS and DoS are also encountered due to updates in the models provided by Roads and Maritime between the two assessments.

Amenity and Human Health

The LCC submission raised a number of issues summarised above, including:

- *The MPW Concept Modification RtS does not adequately address key air quality and noise and vibration concerns previously raised by LCC through the Cardno (2016) report, submitted previously in response to the MPW Concept Modification Report including required reporting methods listed in the SEARs for the Project.*

The MPW Concept Modification RtS considered key issues raised by LCC in reference to the MPW Concept Modification Report (refer to Section 4.5 of the MPW Concept Modification RtS). Further detail regarding submissions raised within the supporting information to the LCC submission (August, 2016) for the MPW Concept Modification Report, including comments related to amenity and health, are provided in Appendix B of this SRtS (tabularised response).

- *LCC commented “As noted by the EPA’s response to their review of the MPW Concept EIS, a more detailed and comprehensive assessment of human health impacts for the Amended Modification Proposal is required to ensure mitigation of potential impacts”.*

The LCC submission refers to “the EPA in response to their review of the EIS documents prepared by the proponents” to support their claim that the content of the MPW Concept Modification RtS lacks sufficient detail to gather an informed understanding of the magnitude of predicted health impacts and suitability of mitigation measures. It is not specified which EIS document LCC is referring to. However, the EPA has recently reviewed the MPW Concept Modification RtS document with respect to health risk, and considers that “the proposed management measures outlined in the modification proposal adequately address the key environmental issues of noise and air quality” (refer to Section 4.3 of this SRtS).

As outlined in Section 7.1.12 of the MPW Concept Modification RtS, the MPW Concept Approval included a desktop based Health Impact Assessment (HIA) and Human Health Risk Assessment (HRA) prepared by EnRisks (2014), from which the Amended Modification Proposal health assessment was based. The HIA methodology was guided by the Centre for Health Equity Training, Research and Evaluation (CHETRE). The findings of this assessment indicated that the potential health risks and impacts posed by the MPW Project would be low, and adequately managed by mitigation measures outlined in the MPW Concept EIS, RtS and SRtS.

As outlined in Section 7.1.12 of the MPW Concept Modification RtS, the importation of clean general fill has the potential to result in noise impacts slightly above those identified in the MPW Concept Approval, which would be able to be managed through the preparation and implementation of a CEMP (as identified in REMM 1B of the MPW Concept Approval) applicable to the relevant future stage of development in which the works are to be constructed in. In addition, the potential air quality impacts resulting from the importation of fill as part of the Amended Modification Proposal (refer to Section 7.1.7 of the MPW Concept Modification RtS) are expected to be low risk and short-term in nature, given the implementation of the mitigation measures detailed in Section 6 of this SRtS.

- *It is recommended further noise modelling is undertaken to more clearly outline the potential impacts associated with the following Amended Modification Proposal components:*
 - *Changes to approved function and re-arrangement of existing approved uses (freight village, truck parking and OSDs)*
 - *Interaction between MPW and MPE sites*

An assessment of noise impacts associated with the Amended Modification, based on the relevant findings from the NVIA prepared for the MPW Stage 2 EIS (refer to Appendix N of the MPW Stage 2 EIS), is provided within Section 7.1.12 of the MPW Concept Modification RtS. As outlined, interaction between the two projects and the rearrangement of existing approved uses would result in negligible change to noise emissions at sensitive receivers. Operational activities would still be contained within the central portion of the site, and vehicle movements would be amended slightly with some vehicles travelling south onto Moorebank Avenue and then into the MPE site. As originally concluded, changes to noise impacts generated from this activity overall and subsequent human health impacts would be negligible. Further modelling would not alter the assessment of likely impact or management controls and is therefore not required.

- *The previous submission regarding Appropriate Regulatory Authorities (ARA) for the MPW Concept Modification Report are reiterated for the MPW Concept Modification RtS.*

Previous discussions have indicated that the Department of Planning and Environment (DP&E) will be the ARA for the Project. The decision of ARA appointment is to be made and communicated to relevant parties by the DP&E for further consideration during assessment.

Land contamination

LCC raised the following issue regarding land contamination relating to the MPW Concept Modification RtS:

- *Further high level commentary regarding the unexpected finds protocol should be included, with specific reference to risk areas on the site including unexploded ordnance and earthworks in areas of contamination.*

As noted in Section 7.1.5 of the MPW Concept Modification RtS, unexpected finds encountered during construction would be managed under a protocol to be outlined in the CEMP. This would include details on construction activities to be undertaken in areas considered of high risk.

Visual Amenity

LCC raised the following issue regarding visual amenity relating to the MPW Concept Modification RtS:

- *The VIA undertaken for the MPW Concept Modification RtS does not adequately assess the visual impacts generated by increased building heights at residences in*

Casula, Carrol Park and the Casula Powerhouse. LCC request a photomontage be provided to illustrate the visual impacts created by changes in building heights.

Viewpoints selected for the VIA undertaken by Reid Campbell for the MPW Concept Modification RtS included three locations considered representative of sensitive receivers in Casula (refer to Figure 7-3 of the MPW Concept Modification RtS). The views at these locations, including viewpoint 03 at Carrol Park, have been assessed using representative photomontages, indicating the representative differences of the MPW Concept Approval and additional heights as a result of the Amended Modification Proposal.

Viewpoint 03 at Carrol Park is an elevated location looking down (south-east) toward the Southern Sydney Freight Line. The assessment at this location (refer to Section 7.1.10 of the MPW Concept Modification RtS) indicates the original visual impact rating of moderate/high is unchanged. As indicated in the View 03 photomontage of the VIA undertaken for the MPW Concept Modification RtS, the retained conservation area would obscure some receivers' view of the additional building height generated by the change in building formation. This, in addition to consideration of distance between receiver and object, would result still result in a moderate/high visual impact, when compared with the assessment undertaken for the MPW Concept Approval.

Additional Amendments

LCC raised the following issue regarding additional amendments relating to the MPW Concept Modification RtS:

- *LCC commented that the Amended Modification Proposal has included a number of Proposal additions not afforded the same scrutiny as that afforded to the initial Concept Plan Modification, stating that this approach lacks transparency. It is recommended these additional components be removed from the Amended Modification Proposal, with a comprehensive EIS prepared to take into account both Moorebank Precinct sites in a site-wide master planned approach.*

As previously outlined, additional amendments to the MPW Concept Approval (SSD 5066) are required to improve the operational and environmental outcomes of the MPW Project. Detailed justification for each of the amendments included within the Amended Modification Proposal was provided in Section 6.5 of the MPW Concept Modification RtS. In addition to this, further detailed assessment of potential changes to environmental impacts associated with the Amended Modification Proposal, from all environmental aspects considered in the MPW Concept Approval, was provided in Section 7 of the MPW Concept Modification RtS. Overall, the inclusion of the Amended Modification Proposal items in the MPW Concept Modification RtS is considered a standard approach to an amendment to the Proposal and has, through consultation, been undertaken in a transparent manner.

5 RESPONSE TO COMMUNITY SUBMISSIONS

5.1 Special interest groups

A total of four submissions were received from special interest groups and immediately surrounding land owners including the following:

- ABB Australia Pty Ltd (ABB)
- East Liverpool Progress Association
- Liverpool Action Group
- Moorebank Residents Action Group.

These submissions have been collated and analysed with responses provided below.

It is noted that a number of the comments received relate to the MPW Stage 2 Proposal and are not within the scope of the Amended Modification Proposal, notwithstanding this we have addressed them and provided further detail where relevant.

5.1.1 ABB Australia Pty Ltd (ABB)

A formal submission comprising a letter (dated 24 February 2017) was received from ABB. Several comments were made, as summarised below:

- **Insufficient exhibition periods:** Given the length of the approval documentation and the potential for impacts on the ABB site and operations, the consultation period was insufficient for ABB to properly understand the impacts and respond. Ongoing consultation with SIMTA is requested.
- **Drainage:** Question the completeness, accuracy and adequacy of the stormwater modelling undertaken, the proposed use of the ABB site to drain the development, and the effects on PCB contamination issues that exist on the ABB site prior to the Proposal.
- **Traffic:** Concerned with the changes to access arrangements into and in the vicinity of the ABB site.
- **Noise and Dust:** Concern with the filling of the site and the assessment of impacts at the ABB site.

Several of the comments provided by ABB relate to specific components of the MPW Stage 2 Proposal, and are not within the scope of the Amended Modification Proposal. Section 2 of the MPW Stage 2 RtS provides a response to these comments. Design changes, particularly for drainage, are included in the MPW Stage 2 Proposal (known as the Amended Proposal) (refer to Sections 6 and 7 of the MPW Stage 2 RtS) to address ABB's concerns.

A detailed response to key issues raised is provided in the following sections.

Insufficient exhibition periods

The ABB submission raised concerns regarding the sufficiency of the exhibition periods, including:

- *Given the length of the approval documentation and the potential for impacts on the ABB site and operations, the consultation period was insufficient for ABB to properly understand the impacts and respond*

The MPW Concept Modification Report was on public exhibition from 7 July 2016 to 22 August 2016 and the following MPW Concept Modification RtS was on public exhibition from 14 December 2016 to 24 February 2017, both of which exceed the minimum timeframe of 30 days stipulated in clause 83 of the *Environmental Planning and Assessment Regulation 2000*. Additionally, the timeframes for exhibition periods are determined by DP&E.

- *Ongoing consultation with SIMTA is requested.*

Consultation has been undertaken progressively, with both ABB and other surrounding landowners, for the MPW Project. Issues raised during previous phases of consultation have been used to shape the assessment approach during this stage of approval (refer to Section 2 of the MPW Concept Modification RtS and Section 2 of this SRtS). Periodic consultation with ABB has been undertaken throughout the preparation of the MPW Concept Modification and the MPW Stage 2 Proposal, including letters on 16 August 2016 and 22 November 2016. Additionally, a meeting was held with ABB on 23 February 2017, during the exhibition period, to consider concerns raised by ABB relating to the MPW Concept Modification. Ongoing consultation with ABB would be undertaken throughout construction and operation of the MPW Project, including the Amended Modification Proposal.

Drainage

The ABB submission raised concerns regarding drainage, including:

- *The completeness, accuracy and adequacy of the stormwater modelling undertaken and the proposed use of the ABB site to drain the development*

The design of drainage infrastructure on the Proposal site is not within the Amended Modification Proposal as it relates to a level of detailed design which is generally not considered at the Concept Approval level.

Regardless, the concerns raised by ABB have been considered at a concept level in the MPW Concept Modification Report and RtS (refer to Section 5 of the MPW Concept Modification Report and Sections 6 and 7 of the MPW Concept Modification RtS), and refinements have been made to the drainage design previously provided within the MPW Stage 2 EIS. No drainage works would be undertaken on the ABB site. Further, drainage design would replicate existing flows, as much as possible, to avoid stormwater impacts (quantity or quality) and flooding impacts on the ABB site.

Refer to the Amended Proposal provided in the MPW Stage 2 RtS (Sections 6 and 7) for additional details.

- *The effects on PCB contamination issues that exist on the ABB site prior to the Proposal.*

As the existing PCB contamination is not within the Amended Modification Proposal site or the broader MPW Project site, the potential effects on this contamination issue within the ABB site have not been considered.

Traffic

The ABB submission raised concerns regarding traffic, including:

- *Concerned with the changes to access arrangements into and in the vicinity of the ABB site.*

The design of the Moorebank Avenue / Anzac Road intersection is not included within the MPW Concept Modification as it relates to a level of detailed design which is generally not considered at the Concept Approval level. This intersection design is consistent with that included in the MPW Concept Approval and therefore modification for this aspect of the MPW Project is not sought.

A concept level assessment of traffic impacts was provided in the MPW Concept Modification Report and RtS (refer to Section 5 of the MPW Concept Modification Report and Sections 6 and 7 of the MPW Concept Modification RtS). This assessment was then further refined for the MPW Stage 2 Proposal and the intersection design is detailed and assessed in the Amended Proposal provided in the MPW Stage 2 RtS (refer to Sections 6 and 7 of the MPW Stage 2 RtS). Traffic modelling and impact assessment, including swept paths, for this intersection and the surrounding road networks is provided in the MPW Stage 2 RtS which confirm vehicles will be able to access the ABB site with the new intersection arrangement.

Access to the ABB site would be maintained throughout construction and operation of the MPW Stage 2 Proposal.

Noise and dust

The ABB submission raised concerns regarding noise and dust, including:

- *Concern with the filling of the site and the assessment of impacts at the ABB site.*

The Noise and Vibration Impact Assessment (NVIA) and Air Quality Impact Assessment (AQIA) referred to in the ABB submissions are in reference to the MPW Stage 2 Proposal, not the MPW Concept Modification or the Amended Modification Proposal.

The submission states that no testing of noise or dust impacts has been conducted on the ABB site, however, the NVIA (prepared for the MPW Stage 2 Proposal) does include the ABB site as a sensitive receiver (Industrial receiver I3), which is specifically considered in the assessment. The AQIA identifies residential areas, schools and day care centres as the most sensitive receivers to be assessed. These sensitive receivers are consistent with those reported in the air quality assessments for the MPW Concept Plan Approval and the MPE Stage 1 EIS (ENVIRON, 2014; ENVIRON, 2015b). Further, the MPW Stage 2 AQIA modelling results indicate that the construction phase emissions, which include the importation of fill to the site, would comply with all relevant impact assessment criteria at these sensitive receivers. As these receivers are more sensitive in nature than industrial facilities the conclusion of the assessment can be extended to the ABB site.

5.1.2 East Liverpool Progress Association

Two submissions (one identified as being from Chipping Norton, the other from Moorebank) were received from the East Liverpool Progress Association (ELPA) as follows:

- ELPA Chipping Norton submission – This submission had two elements. The first is a re-lodgement of the ELPA submission on the MPW Concept Proposal and Stage 1 Early Works EIS, with additional attachments documenting correspondence to the *Australian Financial Review*. The second is a submission on the MPW Stage 2 EIS.
- ELPA Moorebank submission – This submission is expressed to be in relation to the MPW Concept Modification Proposal, MPE Concept Plan Modification Proposal and the MPE Stage 2 EIS.

The first part of the ELPA Chipping Norton submission was considered and responded to in the MPW Concept Proposal RtS, while the issues raised in the submission on MPW Stage 2 EIS have been considered in the MPW Stage 2 RtS.

In addition to the background and contextual information provided with the ELPA Moorebank submission, several comments were made as summarised below:

- **Approval process:** The ELPA submission commented that the Planning Assessment Commission (PAC) should withhold consent and the decision should be made by the Minister for Planning.
- **Traffic:** The ELPA submission raised the following concerns regarding traffic:
 - Roads and Maritime Services (Roads and Maritime) and TfNSW previously agreed to the development of a mesoscopic and microsimulation transport model for the combined MPE and MPW sites. The intended scope of this model should be communicated publicly. It is not clear that the requirements of condition 12 of the MPW Concept Approval have been satisfied.
 - Further review and comment should be made in relation to the dangerous M5 Georges River Bridge merge / weave operation.
 - The Aurecon Moorebank Intermodal Terminal Independent Traffic and Transport review of the MPW Staged SSD (prepared for the NSW Department of Planning and Environment - 8 October 2015) (MPW Concept Approval) should be further considered.
 - The largest component of the identified benefit is the removal of traffic congestion from around and beyond Port Botany. The IMT is merely relocating this traffic congestion.
- **Site operations:** The ELPA submission commented that there is a lack of integration across Moorebank Avenue from rail to warehouse. Concern about the costs and amenity impacts associated with the rerouting of Moorebank Avenue to the eastern boundary of the MPE site.
- **Air quality and noise:** The ELPA submission commented that the IMT is an industrial use involving diesel emissions and noise during operation. The site is located near residential neighbourhoods and is not suitable for this use.
- **Site suitability and alternatives:** The ELPA submission commented that the IMT site (Moorebank Precinct, which includes the MPW site) is in a geographical corner that is reliant upon bridges and is surrounded by existing traffic congestion. Alternative sites at Badgerys Creek and Eastern Creek are expansive green field developments suitable for good planning.
- **Business case and port freight transport demand:** The ELPA submission commented that business case studies used to provide the economic case, and financial support for the development should be made public. Demand for port freight transport is below the lower projections previously provided and the IMT is therefore no longer urgent.

A detailed response to key issues raised is provided in the following sections.

Approval process

The ELPA submission commented that the Planning Assessment Commission (PAC) should withhold consent and the decision should be made by the Minister for Planning.

Under Section 23 of the EP&A Act the Minister may delegate functions under the Act, such as assessment of an SSD Application, to the PAC. Consistent with the instrument of delegation dated 14 September 2011, the PAC is the consent authority for the Amended Modification Proposal.

Traffic

- ELPA raised the following issue with regard to traffic, including:
- *Roads and Maritime Services (Roads and Maritime) and TfNSW previously agreed to the development of a mesoscopic and microsimulation transport model for the combined MPE and MPW sites. The intended scope of this model should be communicated publicly. It is not clear that the requirements of condition 12 of the MPW Concept Approval have been satisfied.*

The comments regarding traffic modelling are not directly related to the Amended Modification Proposal. It is, however, noted that consultation has occurred to ensure the modelling undertaken for the MPW Stage 2 Proposal utilises the appropriate AIMSUN (LMARI) modelling scenario, i.e. Roads and Maritime's model (also referred to as the 'mesoscopic/microsimulation traffic modelling' in Condition 12 of the MPW Concept Approval). In June 2016, SIMTA confirmed that the modelling for the Proposal was to be prepared based on Roads and Maritime's 'Do Nothing Models' (established in March 2016).

A joint agency/service provider meeting was held by SIMTA with Roads and Maritime, TfNSW, LCC and CCC in September 2016 to specifically consult on proposed traffic modelling results for the MPW Stage 2 Proposal, in accordance with the Conditions of Approval (Condition 12 of the MPW Concept Approval (SSD 5066)). The presentation by Arcadis to TfNSW, Roads and Maritime and Liverpool City Council on 27 September 2016 included the provision of information relating to the scope of the traffic and transport impact assessment, the modelling methodology (including scenarios modelled), assumption, results of the modelling and potential road capacity improvements to be implemented on the road network, identified through the outcomes of the traffic modelling.

A summary of key issues raised at this meeting and responses is provided in Table 6-8 of the MPW Stage 2 EIS and the minutes of the meeting are included in the MPW Stage 2 Operational Traffic and Transport Impact Assessment (OTTIA).

- *Further review and comment should be made in relation to the dangerous M5 Georges River Bridge merge / weave operation.*

The comments regarding traffic and safety on the M5 Motorway bridge are not directly related to the Amended Modification Proposal. It is, however, noted that the AIMSUN modelling conducted for the MPW Stage 2 Proposal considered the potential vehicular conflict and delays associated with weaving and merging of traffic at the M5 interchange. In assessing weaving impacts the AIMSUN model examines driver behaviour, vehicle acceleration and deceleration characteristics and the road geometry. It was noted in the OTTIA prepared for MPW Stage 2 Proposal that this weaving issue is not something that is directly related to the presence of the project and is a broader existing road network issue affected by background traffic growth.

- *The Aurecon Moorebank Intermodal Terminal Independent Traffic and Transport review of the MPW Staged SSD (prepared for the NSW Department of Planning and Environment - 8 October 2015) (MPW Concept Approval) should be further considered.*

The *Independent Traffic and Transport review of the MIC Staged SSD* (Aurecon, 2015) was considered by the PAC prior to the decision to grant development consent on 3 June 2016.

- *The largest component of the identified benefit is the removal of traffic congestion from around and beyond Port Botany. The IMT is merely relocating this traffic congestion.*

The comments regarding traffic congestion are not directly related to the Amended Modification Proposal. It is, however, noted the Operational Traffic and Transport Impact Assessment (OTTIA) identifies that the MPW Stage 2 Proposal (which incorporates the elements of the Amended Modification Proposal) would result in generally a less than 5% increase in traffic at key intersections (except for the M5 Motorway/Moorebank Avenue in AM and PM peak in 2019). The OTTIA also shows

that, except for the Moorebank Avenue/Anzac Road intersection, all the key intersections within the study area would require upgrades to manage existing and projected background traffic volumes before the addition of the traffic generated by the MPW Stage 2 Proposal. This is attributable to traffic associated with anticipated population growth in the area.

It is important to note that the Amended Modification Proposal would not generate any increases to heavy vehicles during operation that would not otherwise be on the road. Key benefits of the greater MPW Project include:

- Transfer of road haulage between Port Botany and Western Sydney to rail freight for redistribution thereby helping to reduce vehicle kilometres travelled, ease traffic congestion and provide speed benefits for the Sydney road network
- Easing of the Port Botany bottleneck to enable the Port to cope with future growth and provide large scale freight capacity
- Reductions in articulated truck volumes through the Sydney CBD and inner city suburbs, on the M4 Motorway and the M5 Motorway east of the Moorebank Avenue interchange.

Site operations

The transfer of operational vehicles between the MPW and MPE sites for the purposes of container handling between the IMTs and warehouses on each site is an element of the modification proposal.

A portion of freight would be transferred from the IMT facility to the warehousing area within the MPW site, or to the IMEX terminal on the MPE site, without accessing the broader road network.

Site transfer trucks moving between the MPW and MPE sites would turn right on Moorebank Avenue, and use the signalised MPE site access to enter/exit the MPE site. These traffic movements were assessed in Section 7.1.1 of the MPW Concept Modification RtS.

The realignment of Moorebank Avenue is not part of the Amended Modification Proposal.

Air quality and noise

Noise and air quality issues associated with the operation of the Amended Modification Proposal are discussed in the MPW Concept Modification RtS.

The Noise and Vibration Assessment (refer to Section 7 of the RtS) indicates that the Amended Modification Proposal would result in no exceedance of either the amenity or intrusive noise criteria in Glenfield and Wattle Grove, even under adverse meteorological conditions for most of the sensitive receivers. A 1 dB exceedance could be experienced where noise levels are enhanced by meteorological conditions in Casula, however, this increase is considered negligible and can be effectively mitigated. Predicted L_{Amax} noise levels at sensitive receivers are compliant as they are less than sleep disturbance screening levels at all monitoring locations.

The Air Quality Impact Assessment (refer to Section 7 of this RtS) indicates that the Amended Modification Proposal would comply with all relevant impact assessment criteria.

Site suitability and alternatives

The comments regarding site suitability and alternatives are not directly related to the Amended Modification Proposal. These matters are addressed in Chapter 3 (Strategic context and need for the project) and Chapter 6 (Project development and

alternatives) of the MPW Concept EIS. Further discussion is also provided in Section 6.4 of the MPW Concept SRtS and Section 5.4 of the MPW Concept SRtS.

Business case and port freight transport demand

The comments regarding the business case and port freight transport demand are not directly related to the Amended Modification Proposal. It is however noted that business case assessment was approved by the Infrastructure Australia board in February 2015 and is publicly available. The business case assessment identifies that:

- An intermodal terminal could be economically viable, particularly given the growth potential of Port Botany, the long timeframes for alternative road transport improvements such as WestConnex, and the likely continued congestion in the immediate Port Botany area.
- The use of alternative ports to Port Botany is not commercially viable because of the greater distances to the Sydney metropolitan destinations and economies of scale of stevedoring.
- An IMT at Moorebank was chosen as there is no other potential terminal site in the Sydney basin that has the same locational advantages, size, short-term availability, existing road and rail connections and ability to meet long-term industry needs at the time of the assessment.

With reference to the comments about port freight transport demand it is noted that while compound annual container growth through Port Botany has been over seven per cent for a tenyear period to 2012, current forecasts are slightly more conservative with a forecast average annual growth rate of 6.2 % over the period 2014-2019.

At the projected TEU throughput growth of 6.2 % per annum (Port Authority of NSW forecasts) throughput is expected to reach 3.2 million TEU in 2020. Over the longer term, the NSW Freight and Port Strategy predicts that total throughput at Port Botany is forecast to reach seven million TEU by 2030.

5.1.3 Liverpool Action Group

A formal submission was received (undated) from the Liverpool Action Group. Several comments were made, as summarised below:

- | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">• Site location: The site location is wrong considering the proximity to housing and the Georges River |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|

A detailed response to key issues raised is provided in the following sections.

Site location

The Liverpool Action Group submission raised concerns regarding the site selection, including:

- *The site location is wrong considering the proximity to housing and the Georges River.*

The MPW Concept EIS included consideration of the site and potential alternative sites. Site selection is not considered further in the scope of the modification.

In particular, there has been strong and consistent support at State and Commonwealth Government levels for the development of an IMT in Moorebank. The MPW site has been earmarked as a highly suitable location for an IMT in both freight and distribution strategy and there is demonstrable demand for an IMT within the area

(refer to Section 3 of the MPW Stage 2 EIS). Development of the land for the purposes of an IMT is therefore considered the most suitable and highest and best use for the land. The Commonwealth and State governments have further endorsed the development of an IMT on the MPW site through granting approvals including the MPW EPBC Approval (No. 2011/6086) and the MPW Concept Approval (SSD 5066).

Mitigation measures are included within the MPW Concept SRtS, MPW Stage 2 EIS and the MPW Concept Modification RtS to minimise the impact of the MPW Project on the surrounding environment and community.

5.1.4 Moorebank Residents Action Group

A formal submission was received (undated) from the Moorebank Residents Action Group. Several comments were made, as summarised below:

- **Importation of fill:** Importation of this quantity of fill is not a minor modification and a new application is required
- **Increased footprint:** Object to the increase in footprint of the facility. This is not a minor modification and requires further assessment, particularly regarding biodiversity.

A detailed response to key issues raised is provided in the following sections.

Importation of fill

The Moorebank Residents Action Group submission raised concerns regarding the importation of fill, including:

- *Importation of this quantity of fill is not a minor modification and a new application is required*

Section 96(2) of the EP&A Act allows a consent authority to modify a development consent, provided that *'it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all).'*

The Amended Modification Proposal includes the importation of clean general fill as part of future development applications (Stage 2 of the MPW Project) and also other associated modifications which are required to improve the operational and environmental outcomes of the MPW Project as a whole. Detailed justification for each of the amendments included within the Modification Proposal has been provided in Section 6 of the MPW Concept Modification RtS. In addition to this, detailed further assessment of the potential environmental issues associated with the Amended Modification Proposal, from all environmental aspects considered in the MPW Concept Approval, has been provided in Section 7.1 of the MPW Concept Modification RtS.

Overall, the importation of clean general fill would result in a considerable improvement to drainage within the MPW site, and the surrounding area. The additional works would result in a temporary intensification of construction works approved under Stage 1 (Early Works) of SSD 5066. The timing for the importation of this clean general fill, within Stage 2 of the MPW Project, more closely aligns with the maximum construction traffic vehicles presented within the MPW Concept Approval which is considered the key potential environmental impact posed by this modification. In particular, the Amended Modification Proposal would result in only an additional 90 vehicle movements per day over a short duration (in the context of the overall development) which could be adequately managed through controls to be included within the CEMP for the MPW Project (refer to REMM 1B, identified within the MPW Concept Approval).

Overall, the modification (Amended Modification Proposal) would not result in any substantial environmental impacts further to those identified in the MPW Concept EIS, with these potential impacts being able to be adequately managed through the implementation of the MCoA and the REMMs provided within the MPW Concept Approval and additional mitigation measures identified in Section 8 of the MPW Concept Modification RtS, as amended in Section 6 of this SRtS. Further, the Amended Modification Proposal proposes a development which is 'substantially the same' as that provided within the MPW Concept Approval in that it would facilitate for

the development of an intermodal terminal facility with the same IMT throughput limitations, warehousing GFA, freight village, truck parking and other ancillary development as provided within the MPW Concept Approval. On this basis, the Amended Modification Proposal is considered substantially the same development and can be considered for approval under s96(2) of the EP&A Act.

Increased footprint

The Moorebank Residents Action Group submission raised concerns regarding the increased footprint, including:

- *Object to the increase in footprint of the facility. This is not a minor modification and requires further assessment, particularly regarding biodiversity*

The Amended Modification Proposal makes minor changes to the Project site footprint regarding construction works around the Moorebank Avenue / Anzac Road intersection. These footprint changes are assessed in the MPW Concept Modification RtS. Of note is that these works would not require additional clearance of threatened ecological communities listed as threatened under the EPBC Act and/ or TSC Act. The Amended Modification Proposal would not result in any changes to biodiversity impacts during construction of the MPW Project from those previously assessed and approved in the MPW Concept EIS.

5.2 Community Submissions

This section provides a summary of the submissions raised by the public and interest groups. Submissions have been grouped and responded to by environmental aspect, within Table 4-1.

Table 4-1 Response to community submissions

Issue	#	Summary	Comments	Reference
Traffic				
Congestion/Capacity	1.A.1	Concerned that Moorebank and Moorebank Avenue in particular is inadequate for large container trucks and is already congested	An assessment of traffic and transport impacts from the Amended Modification Proposal is representative of the assessment undertaken for the MPW Stage 2 RtS Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS). This study assesses intersection performance at site access points and key intersections within vicinity of the MPW site during the importation of clean general fill in a worst-case construction scenario, along with cumulative construction impacts from Stage 1 of the MPE Project (refer to Scenario 2, Section 2.1.2 of the MPW Stage 2 Revised CTIA). As shown in Section 5.1 of the Appendix C of the MPW Stage 2 RtS during the peak construction period, it is expected that approximately 112 vehicles (0 cars and 112 trucks) would be travelling to and from the Proposal site during the AM peak hour (8-9am) and approximately 386 vehicles (274 cars and 112 trucks) would be travelling to/from the Proposal site during PM peak hour (5-6pm). A total of 740 (two-way) heavy vehicle trips and 190 (two way) light vehicle trips per day would occur over a six to nine-	Section 6 of the MPW Concept Modification RtS Section 2 and 6 of the MPW Stage 2 RtS Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS) MPW Concept EIS
	1.A.4	Concerns that support vehicles and trucks from the Proposal would create congestion on the surrounding road network		
	1.A.6	Concerns that the Proposal would result in congestion in nearby suburbs including Moorebank, Chipping Norton, Casula, Liverpool and Prestons		

Issue	#	Summary	Comments	Reference
	1.A.8	Extra traffic congestion will cause strain on local resources including shops and travel times	month period for the importation of clean fill to the MPW site.	
	1.A.2	Concern that the Proposal would add to existing traffic congestion on roads in the vicinity of the project. Specifically M5, M7, Newbridge Road, Heathcote Road and the Hume Highway, especially heavy vehicles. Concerned also by fill increasing the impact of previously mentioned issues	The traffic study area included areas of the broader road network, including Heathcote Road, Newbridge Road, the Hume Highway and the M7 Motorway. Trucks associated with the importation of clean general fill are expected to travel from the north via Moorebank Avenue. No construction trucks are expected to travel via Anzac Road. There would be minor truck movements via Cambridge Avenue for disposal of unsuitable material (to the Glenfield Waste Facility).	
	1.A.9	The local community cannot handle the increased number of trucks and congestion	The assessment results indicate that the traffic impacts from the Amended Modification Proposal in peak periods is relatively small compared to the existing traffic volumes on Moorebank Avenue, and the construction traffic impact along Moorebank Avenue, and the broader road network is anticipated to be minor, which is consistent with the findings from the MPW Concept Approval.	
	1.A.12	New suburbs have been established nearby and already the traffic is horrendous		
	1.A.16	Roads cannot support current levels of traffic let alone the increases that this project will bring		
	1.A.18	The road system can't cope with the extra 2,500 trucks per day and 104 per hour on Moorebank Avenue plus current local congestion	The intersection performance analysis (using SIDRA) provided in Section 6.1.4 of the MPW Stage 2 Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS) indicates that all key intersections would experience an increased average delay under the cumulative construction scenario, and the Level of Service (LoS) ⁴ would remain the same, when	

⁴ A LoS of D or higher is considered satisfactory.

Issue	#	Summary	Comments	Reference
			<p>compared to the existing conditions, with the exception of:</p> <ul style="list-style-type: none"> The Anzac Road/ Moorebank Avenue intersection in the AM peak, where the LoS would reduce from a LoS B to a LoS C. The performance of the intersection would continue to be considered acceptable. The M5 Motorway/ Moorebank Avenue interchange in the AM Peak, where the LoS would reduce from a LoS B to a LoS C. The performance of the intersection would continue to be considered acceptable. <p>These results indicate that key intersections near the MPW site would operate at an acceptable LoS during the AM and PM peak periods of the Amended Modification Proposal.</p>	
	1.A.3	Proposal would add to increasing road congestion created by upcoming apartment developments and from general population growth in the area	<p>Calculations have been made in the CTIA to estimate worst case scenario background traffic volumes in the area. 2015 traffic volumes were multiplied with a 1.8% per annum (compound) growth rate, consistent with the growth projections in the LMARI Traffic Model (provided by Roads and Maritime Services). The extent of future development considerations is dependent on the LMARI Traffic Model, provided by Roads and Maritime Services.</p>	<p>Section 2 and 6 of the MPW Stage 2 RtS Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS)</p> <p>Section 8 of the MPW Concept Modification RtS</p>

Issue	#	Summary	Comments	Reference
	1.A.5	Congestion from the movement of fill to site, which would potentially put children in schools at risk due to increased traffic	<p>Traffic impacts and intersection upgrades for the construction works associated with the physical importation of clean general fill would occur during Stage 2 of the MPW Project, as per the Amended Modification Proposal. An assessment of traffic and transport impacts for the MPW Stage 2 Proposal (Refer to Appendix C of the MPW Stage 2 RtS) indicates that any potential congestion impacts associated with increased truck movements to facilitate the importation of clean general fill (inclusive of cumulative MPE Stage 1 construction) would be largely confined to Moorebank Avenue. Appropriate mitigation measures and management plans would be applied to mitigate this impact resulting in an overall minor impact (refer to Section 6 of this SRtS). These results are consistent with those in the MPW Concept Approval.</p> <p>While it is anticipated that additional truck movements to facilitate the movement of clean general fill on the wider road would carry a perception of increased safety risks, it is not anticipated that this activity would increase road safety risks in school zones. The nearest schools from the development site (within a 2 km radius) include Casula Public School, Prestons Public School, Casula High School, St Francis Xavier Primary School, Liverpool West Public and Wattlegrove Public School. Access to schools within the local area are not directly accessible from major arterial roads, such as the M5 Motorway, and trucks associated with the Amended Modification Proposal would not travel directly past these schools.</p>	<p>Section 2 and 6 of the MPW Stage 2 RtS Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS)</p> <p>Section 6 of this SRtS</p>

Issue	#	Summary	Comments	Reference
	1.A.10	No adequate attempt has been made to deal with the 10,000 trucks per day the site will generate	It is estimated that during construction over a six to nine-month period the Amended Modification Proposal would generate approximately 1,480 heavy vehicle trips per day (two way) and 190 light vehicle trips per day (two way) in a worst-case scenario. Subject to the implementation of the REMMs (Section 8 of the RtS), the impacts of the Amended Modification Proposal could be adequately managed and would be consistent the MPW Concept Approval.	Section 7.1 of the MPW Concept Modification RtS Section 8 of the MPW Concept Modification RtS
	1.A.11	What impact will stormwater and road works have on traffic in the local area	<p>As discussed in Section 7.1 of the MPW Concept Modification RtS, the Amended Modification Proposal would include adjusted stormwater infrastructure and building formation levels, leading to an overall improvement to stormwater across the MPW site, when compared to the MPW Concept Approval. Additional stormwater works as part of the Amended Modification Proposal would not have any additional impacts to local traffic compared to the MPW Concept Approval.</p> <p>As discussed in Section 6.3 of the MPW Stage 2 Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS), it is anticipated that short-term road closures of part of Moorebank Avenue would be required to facilitate construction of the Moorebank Avenue / Anzac Road intersection upgrade, proposed as part of Stage 2 of the MPW Project. Despite being out of scope of the Amended Modification Proposal, any road closures required as part of construction of Stage 2 of the MPW Project would be undertaken through the appropriate application and consultation process in accordance with procedures outlined</p>	Section 7.1 of the MPW Concept Modification RtS Section 6.3 of the MPW Stage 2 Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS)

Issue	#	Summary	Comments	Reference
			within the CEMP (and CTMP) for Stage 2 of the MPW Project, and may also be subject to a separate permit application e.g. Road Occupancy Licence (ROL).	
	1.A.13	Importation of 2.2 million cubic meters of fill will require trucks to be on the roads 24 hours a day	<p>As discussed in Section 1 of the MPW Concept Modification RtS, the Amended Modification Proposal amends the MPW Concept Approval to allow the import, placement, stockpiling, spreading and compaction of approximately 1,600,000m³ of clean general fill during Stage 2 of the MPW Project.</p> <p>Furthermore, it is not intended that fill would be imported 24 hours a day. As outlined in Section 6.3 of the MPW Concept Modification RtS, the importation of clean general fill is proposed to be undertaken between 6:00am and 10:00pm weekdays and 8:00am and 6:00pm on Saturdays.</p>	Section 1, 6 and 7 of the MPW Concept Modification RtS
	1.A.15	Road reconfiguration will not remove the problems associated with increased traffic	<p>The Amended Modification Proposal would not alter the approach to the implementation of upgrades to the surrounding traffic road network as identified within the MPW Concept Approval.</p> <p>As identified within the responses above, increased traffic associated with the Amended Modification Proposal was been assessed in Section 6.1.4 of the MPW Stage 2 Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS). The results indicate that key intersections near the MPW site would operate at an acceptable LoS during the AM and PM peak periods of the Amended Modification Proposal.</p>	Section 6 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
	1.A.17	Outdated and inaccurate traffic projections put forward by the Intermodal are a key problem of all applications.	<p>An updated assessment of traffic impacts for the Amended Modification Proposal was provided in the MPW Concept Modification RtS. The modelling for the assessment has been undertaken based on the following:</p> <ul style="list-style-type: none"> • Previous modelling and reporting undertaken for the Moorebank Precinct including for the MPW Concept Approval (SSD 5066), MPE Concept Approval (MP 10_0193) and MPE Stage 1 Approval (SSD 14-6766) all of which have been previously reviewed and approved by the Department of Planning & Environment (DP&E). • The Roads and Maritime LMARI model which has been prepared for the Liverpool Local Government Area and includes appropriate traffic growth projections. Numerous meetings, emails and telephone conversations with Roads and Maritime have been undertaken to ensure that the modelling undertaken for the Proposal utilises the appropriate AIMSUN (LMARI) model and assessment approach. <p>Overall, the modelling for the project is consistent with the Conditions of Approval for the MPW Concept Approval, which requires the use of the LMARI model. The projections for the regions on this model are determined by Roads and Maritime. The basis for the modelling is therefore considered current and appropriate for the assessment of the potential traffic impacts associated with the Amended Modification Proposal.</p>	Section 7.1.1 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
Assessment	1.B.1	450,000 additional truck movements for fill has not been studied nor "considered for mitigation" and will worsen traffic congestion	<p>It is estimated that over a six to nine-month period the Amended Modification Proposal would generate approximately 740 (two way) heavy vehicle trips per day and 190 (two way) light vehicle trips per day. This would result in considerably less total truck movements than 450,000.</p> <p>An assessment of traffic and transport impacts from the Amended Modification Proposal is representative of the assessment undertaken for the MPW Stage 2 RtS Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS).</p> <p>The intersection performance analysis (using SIDRA) provided in Section 6.1.4 of the MPW Stage 2 Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS) indicates that all intersections would experience an increased average delay under the cumulative construction scenario and the Level of Service (LoS) would remain the same, when compared to the existing conditions, with the exception of:</p> <ul style="list-style-type: none"> • The Anzac Road/ Moorebank Avenue intersection in the AM peak, where the LoS would reduce from a LoS B to a LoS C. The performance of the intersection would continue to be considered acceptable. • The M5 Motorway/ Moorebank Avenue interchange in the AM Peak, where the LoS would reduce from a LoS B to a LoS C. The 	Section 2 and 6 of the MPW Stage 2 RtS Revised CTIA (Appendix C)

Issue	#	Summary	Comments	Reference
			<p>performance of the intersection would continue to be considered acceptable.</p> <p>These results indicate that key intersections near the MPW site would operate at an acceptable LoS during the AM and PM peak periods of the Amended Modification Proposal.</p>	
	1.B.2	DP&E should start again with the precinct plan and EIS in light of these new applications	The Amended Modification Proposal would seek to modify only the existing MPW Concept Approval. The proposed changes are generally consistent with the MPW Concept Approval, and as such have been assessed as a modification only. A precinct plan is not considered relevant as the MPW Concept Approval establishes development principles, that although altered in part of this modification, still meet the anticipated intent for the MPW Project.	Section 1 of the MPW Concept Modification RtS
	1.B.3	SIMTA has given no meaningful response to DP&E and PAC for preparing a plan to accommodate additional traffic from the Proposal	The Modification application commenced in June 2016, and timing is determined by DPE assessment procedures within the EP&A Act and Regulation. Delaying the application process to take account of updated planning documents within assessment documentation is not standard practice and is not consider appropriate.	Section 7.1 of the MPW Concept Modification RtS
	1.B.4	It is improper for this modification application to be assessed before the NSW transport planning reports due to be released as per the 2016/17 Budget Estimates Hearing of the NSW Government which state "The NSW Government has committed \$3.4 million to progress studies into road infrastructure options to manage traffic impacts from the proposed Moorebank	An assessment of traffic and transport impacts from the Amended Modification Proposal is representative of the assessment undertaken for the MPW Stage 2 RtS Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS). This study assumes a worst-case cumulative scenario inclusive of the Amended Modification Proposal. It would be anticipated that any work carried out by the NSW Government as part	Section 2 and 6 of the MPW Stage 2 RtS Revised CTIA (Appendix C)

Issue	#	Summary	Comments	Reference
		Intermodal Terminal and forecast growth in the broader Liverpool and Moorebank area.”	of other projects would improve traffic performance. The findings of this assessment indicate that construction traffic impacts associated with the Amended Modification Proposal would be consistent to those presented in the MPW Concept Approval, indicating that all key intersections within vicinity of the MPW would operate at a satisfactory LoS.	
	1.B.6	Traffic mitigation measures do not take into account the critical congestion point of a 1km section of the M5 between Moorebank Avenue and the Hume Highway called the Georges River Bridge	<p>The traffic mitigation measures identified in Section 8 of the MPW Concept Modification RtS are considered appropriate to manage potential traffic impacts imposed by the Amended Modification Proposal.</p> <p>Congestion impacts associated with the M5 Motorway / Hume highway interchange (and associated with the Georges River bridge) are considered outside scope for the traffic assessment of the Amended Modification Proposal. Impacts to the M5 Motorway / Moorebank Avenue interchange generated as a result of the importation of clean general fill were assessed as part of the MPW Stage 2 Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS). As outlined in Section 6.1 of this report, SIDRA intersection analysis indicates that this intersection would operate at an acceptable LoS during the AM and PM peak periods.</p>	<p>Section 8 of the MPW Concept Modification RtS</p> <p>Section 6.1 of the MPW Stage 2 Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS)</p>
	1.B.7	The Traffic Impact Assessment Report prepared by Arcadis is extremely vague lacking in substantial evidence and depth to show how exactly do they intend to mitigate both noise and traffic both in and outside peak periods. Why is there no	The results from the updated traffic investigation (refer to Section 6.1 of the MPW Stage 2 Revised CTIA, Appendix C of the MPW Stage 2 RtS) indicates that construction traffic during peak AM and PM periods for the Amended Modification Proposal, when compared to existing volumes, would maintain a LoS	<p>Section 11 of the MPW Concept EIS</p> <p>Section 7.1 of the MPW Concept Modification RtS</p>

Issue	#	Summary	Comments	Reference
		mention of the impact of traffic to Casula/Liverpool Links who are adversely affected? Please show evidence that shows otherwise.	<p>at key intersections of C or better. The results from the NVIA (refer to Section 7.1.2 of the MPW Concept Modification RtS) indicates no significant change (less than 2 dBA) in noise impacts generated by traffic as a result of the Amended Modification Proposal, when compared to the results of the MPW Concept EIS, which demonstrates compliance with the <i>NSW Road Noise Policy</i>. These results are inclusive of residential receivers at Casula/Liverpool Links.</p> <p>As a result of the above assessments, mitigation and management measures identified in Section 6 of this SRtS would be implemented.</p>	Section 6 of this SRtS
Safety	1.C.1	Increase in traffic, particularly heavy vehicles, potentially causing an increase in traffic accidents this area will "overwhelm" residents and normal users of the road	As outlined in Section 7.1 of the MPW Concept Modification RtS, an assessment of existing traffic safety of Moorebank Avenue and sections of the M5 Motorway (in accordance with the Roads and Maritime Accident Reduction Guide Version 1.1 [Roads and Maritime, 2005]) was undertaken for the MPW Concept Approval. The assessment of traffic and transport impacts undertaken for the Amended Modification Proposal (refer to Section 6.5.1 of MPW Stage 2 Revised CTIA, Appendix C of the MPW Stage 2 RtS) indicate that construction traffic during peak AM and PM periods for the Amended Modification Proposal, when compared to existing volumes, would maintain a LoS at key intersections of C or better (i.e. a satisfactory level of service and traffic flow through key intersections). It is therefore concluded that the increases in traffic associated with the Amended Modification Proposal would not	Section 7.1 of the MPW Concept Modification RtS
	1.C.2	Any traffic increase in this area will "overwhelm" residents and normal users of the road		Section 6.5.1 of MPW Stage 2 Revised CTIA, Appendix C of the MPW Stage 2 RtS).

Issue	#	Summary	Comments	Reference
			significantly increase the risk of traffic accidents along State roads used for haulage, nor to existing congestion.	
	1.C.6	Safety of heavy vehicles using local roads	<p>The vehicles likely to be used to facilitate the importation of clean general fill associated with the Amended Modification Proposal would be restricted access vehicles (RAVs). These vehicles are restricted under the <i>Roads Transport (Mass Loading and Access) Regulation 2005</i> and the <i>Road Transport (Vehicle Registration) Regulation 2007</i> from using roads outside of the routes identified on RMS RAV maps (heavy vehicle access routes), to adhere to specific safety standards.</p> <p>Indicative haulage routes and road access restrictions for the Amended Modification Proposal construction are discussed in Section 6.5.1 of MPW Stage 2 Revised CTIA, Appendix C of the MPW Stage 2 RtS. These haulage routes have been chosen so that sensitive local residential roads are protected from amenity impacts associated with heavy vehicle movements and arterial roads are used.</p>	<p>Section 7.1 of the MPW Concept Modification RtS</p> <p>Section 6.5.1 of MPW Stage 2 Revised CTIA, Appendix C of the MPW Stage 2 RtS).</p>
Road Infrastructure	1.D.1	Damage to roads from increases in heavy vehicle numbers	<p>The increase in heavy vehicle numbers from the Amended Modification Proposal has the potential to result in increased asset degradation. Indicative haulage routes and road access restrictions for the Amended Modification Proposal construction are discussed in Section 6.5.1 of MPW Stage 2 Revised CTIA, Appendix C of the MPW Stage 2 RtS. These haulage routes have been chosen so that sensitive</p>	<p>MCoAs for SSD 5066</p> <p>Section 6.5.1 of MPW Stage 2 Revised CTIA (Appendix C of the MPW Stage 2 RtS)</p>

Issue	#	Summary	Comments	Reference
			<p>local residential roads are protected from amenity impacts associated with heavy vehicle movements and arterial roads are used.</p> <p>Additionally, in accordance with B17 of the MCoAs for the MPW Concept Approval, a road dilapidation survey would be undertaken. Any damage caused to roads as a result of traffic and transport works (during Early Works) would be rectified by the applicant.</p>	
	1.D.2	Existing road infrastructure is not adequate to support the project	As outlined within Section 6.5.1 of MPW Stage 2 Revised CTIA (Appendix C of the MPW Stage 2 RtS), upgrades to the Anzac Avenue / Moorebank Avenue would be undertaken to facilitate the MPW Project. This upgrade would be undertaken in stages, during which construction traffic and other background traffic would continue to travel along Moorebank Avenue.	Section 6.5.1 of MPW Stage 2 Revised CTIA (Appendix C of the MPW Stage 2 RtS),
	1.D.6	Transport links are already struggling with current numbers	<p>The Amended Modification Proposal would not alter the approach to the implementation of upgrades to the surrounding traffic road network as identified within the MPW Concept Approval.</p> <p>As identified within the responses above, increased traffic associated with the Amended Modification Proposal was been assessed in Section 6.1.4 of the MPW Stage 2 Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS). The results indicate that key intersections near the MPW site would operate at an acceptable LoS during the AM and PM peak periods of the Amended Modification Proposal.</p>	

Issue	#	Summary	Comments	Reference
	1.D.4	Moorebank Avenue would need to be widened to at least 3 lanes each way for project to be feasible	<p>The Amended Modification Proposal does not include a temporary diversion road along Moorebank Avenue. Any re-alignment of Moorebank Avenue would be subject to appropriate planning approvals and public exhibition in the future.</p> <p>The layout of Moorebank Avenue proposed for the Concept Approval would be upgraded from a two lane two-way road, to a four lane divided roadway (between the East Hills Railway Line and M5 Motorway). No changes to this layout is proposed in association to the Amended Modification Proposal.</p>	<p>MPW Concept EIS</p> <p>Section 6 of the MPW Concept Modification RtS</p> <p>Section 6 of the MPW Stage 2 Revised CTIA, Appendix C of the MPW Stage 2 RtS</p>
	1.D.5	Construction of a temporary diversion road to allow diversion along Moorebank avenue will cause traffic chaos	The Amended Modification Proposal does not include a temporary diversion road along Moorebank Avenue. Any re-alignment of Moorebank Avenue would be subject to appropriate planning approvals and public exhibition in the future.	N/A
	1.D.7	Early works for fill importation will begin before road upgrades will be complete, significantly impacting traffic and invalidating early modelling	<p>Traffic impacts and construction works associated with the import of clean general fill would now be undertaken during Stage 2 of the MPW Project, as per the Amended Modification Proposal.</p> <p>No permanent road upgrades would be required to facilitate the Amended Modification Proposal.be facilitated through the construction of the western leg of Moorebank Avenue / Anzac Road intersection, and has been considered in the traffic and transport impact assessment.</p>	<p>Section 7.1 of the MPW Concept Modification RtS</p> <p>Section 3 and 6 of the MPW Stage 2 Revised CTIA, Appendix C of the MPW Stage 2 RtS</p>
	1.D.9	Plans do not consider Cambridge Avenue not its redevelopment, it is a	As per MCoA D11 for the MPW Concept Approval, under the Amended Modification Proposal, construction heavy vehicles would be prohibited from	Section 7.1 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
		major arterial road. Thus the plan is flawed for not considering it	<p>travelling further south on Moorebank Avenue than the southern extent of the MPE site and, in particular, from using Cambridge Avenue (with the exception heavy vehicles travelling to/from the Glenfield Waste Facility). This condition is reflected in construction traffic distribution estimates associated with the Amended Modification Proposal, provided in Section 5.2 of the MPW Stage 2 Revised CTIA, (refer to Appendix C of the MPW Stage 2 RtS).</p> <p>During construction, the majority of heavy vehicles would travel from the north to the MPW site, via Moorebank Avenue, with the exception of minor truck movements travelling from the MPW site via Cambridge Avenue for disposal of unsuitable material (to the Glenfield Waste Facility). These vehicle movements are minor (i.e. less than 0.5% of truck movements). These movements would not significantly impact on Cambridge Avenue.</p>	Section 7.1 and Section 22 of the MPW Stage 2 EIS
Use of local roads	1.E.1	Commuter vehicles utilising back roads to avoid congestion	<p>As identified within the responses above, increased traffic associated with the Amended Modification Proposal was been assessed in Section 6.1.4 of the MPW Stage 2 Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS). The results indicate that key intersections near the MPW site would operate at an acceptable LoS during the AM and PM peak periods of the Amended Modification Proposal, thereby not significantly exacerbating congestion and the need for commuter vehicles to use local roads.</p> <p>Further, indicative haulage routes and road access restrictions for the Amended Modification Proposal construction are discussed in Section 6.5.1 of MPW</p>	Section 6 of the MPW Stage 2 Revised CTIA (refer to Appendix C of the MPW Stage 2 RtS)
	1.E.3	Increase in traffic on surrounding local roads		
	1.E.4	Heavy vehicles getting in accidents on local roads and endangering houses and pedestrians		

Issue	#	Summary	Comments	Reference
			Stage 2 Revised CTIA, Appendix C of the MPW Stage 2 RtS. These haulage routes have been chosen so that sensitive local residential roads are protected from amenity impacts associated with heavy vehicle movements and arterial roads are used exclusively where possible.	
Noise				
Crushing Plant	2.A.1	Noise impacts from the crushing plant on the suburbs of Casula, Glenfield and Wattle Grove	<p>Section 7 of the MPW Concept Modification RtS provides a comparison of changes from the MPW Concept Approval to the Amended Modification Proposal, and an assessment of associated noise and vibration impacts.</p> <p>The results from the assessment undertaken in Section 7 of the MPW Concept Modification RtS (including noise impacts associated with crushing activities) indicate that the impacts of the Amended Modification Proposal would be adequately managed and would be generally consistent to those identified in the MPW Concept Approval.</p>	Section 7.1 of the MPW Concept Modification RtS
Operational noise	2.B.1	Concerned warehouses built will be insufficient to block operational noise from the community	<p>Potential noise impacts are documented in the MPW Concept EIS and Section 7 of the MPW Concept Modification RtS (assessment of the Amended Modification Proposal).</p> <p>Overall, subject to the implementation of the REMMs (MPW Concept SRtS), the impacts of the Amended Modification Proposal would be adequately managed and would be generally consistent to those identified in the MPW Concept Approval. Further, no change is proposed in the Amended Modification Proposal to the operational aspects and impacts previously</p>	-

Issue	#	Summary	Comments	Reference
			assessed and approved in the MPW Concept Approval.	
	2.B.2	Insufficient mitigation is provided for noise generation and receivers	Potential noise impacts are documented in the MPW Concept EIS and Section 7 of the MPW Concept Modification RtS (assessment of the Amended Modification Proposal).	Section 7.1 of the MPW Concept Modification RtS
	2.B.3	Additional noise walls should be constructed around the perimeter of the site to better mitigate noise emissions.	Overall, subject to the implementation of the REMMs (MPW Concept SRtS), the impacts of the Amended Modification Proposal would be adequately managed and would be generally consistent to those identified in the MPW Concept Approval. The assessment identified that construction noise levels at the most sensitive receivers at the majority of locations would not exceed the established noise management levels (NMLs). The only exceedance is in Casula which is predicted to exceed the established NML by up to 1 dB, which is considered imperceptible and, therefore, does not require mitigation.	
	2.B.4	Noise from the construction and operation of 300,000m ² of warehousing and distribution facilities of the Proposal will negatively affect residents	The Amended Modification Proposal does not propose to change the warehousing and distribution facilities as approved in the MPW Concept Approval. The results from the assessment undertaken in Section 7 of the MPW Concept Modification RtS indicate that the Amended Modification Proposal would not generate any operational noise exceedances of relevant criteria, and would be generally consistent with the assessment as proposed under the MPW Concept Approval.	Section 7.1 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
	2.B.5	The continuous transfer of containers between the MPE stage 1 IMT and the Proposal's warehousing and distribution facilities will require heavy vehicles capable of being loaded with containers and used on MPE stage 2 site will cause 24/7 noise.	<p>The results from the assessment undertaken in Section 7 of the MPW Concept Modification RtS indicate that the Amended Modification Proposal (including the movement of operational vehicles from the MPW site to the MPE site) would not generate any exceedances of relevant criteria and would be generally consistent with the assessment as proposed under the MPW Concept Approval.</p> <p>Noise impacts from the operation of the MPE site have been discussed and assessed in the MPE Stage 2 EIS, which was placed on public exhibition between 13th December 2016 and the 24th February 2017.</p>	Section 7.1 of the MPW Concept Modification RtS MPE Stage 2 EIS
General	2.C.1	The proposal will increase noise pollution, specifically 24 hour operations, impacting the health of residents	<p>The location of construction plant and equipment and vehicle movements has been considered in the Noise and Vibration Assessment undertaken for the Amended Modification Proposal. Careful consideration has been given to the construction activities to be undertaken with some activities limited to certain construction hours to minimise noise impacts on surrounding residential receivers. The results from the assessment undertaken in Section 7 of the MPW Concept Modification RtS indicate that, subject to the implementation of the REMMs (refer to Section 7 of the MPW Concept SRtS), the impacts of the Amended Modification Proposal would be adequately managed and would be generally consistent to those identified in the MPW Concept Approval. The assessment identified that construction noise levels at the most sensitive receivers at the majority of locations would not exceed the</p>	<p>Section 7.1 of the MPW Concept Modification RtS</p> <p>Section 7 of the MPW Concept SRtS</p>

Issue	#	Summary	Comments	Reference
			established noise management levels (NMLs). The only exceedance is in Casula which is predicted to exceed the established NML by up to 1 dB, which is considered imperceptible and, therefore, does not require mitigation.	
	2.C.2	The Proposal will result in noise impacts to residents in what are now considered quiet neighbourhoods	A Noise and Vibration Assessment (refer to Section 7 of the MPW Concept Modification RtS) provides a comparison of changes from the MPW Concept Approval to the Amended Modification Proposal, and an assessment of associated noise and vibration impacts. The results from the assessment undertaken in Section 7 of the MPW Concept Modification RtS indicate that, subject to the implementation of the REMMs (refer to Section 7 of the MPW Concept SRtS), the impacts of the Amended Modification Proposal would be adequately managed and would be generally consistent to those identified in the MPW Concept Approval. The assessment identified that construction noise levels at the most sensitive receivers at the majority of locations would not exceed the established noise management levels (NMLs). The only exceedance is in Casula which is predicted to exceed the established NML by up to 1 dB, which is considered imperceptible and, therefore, does not require mitigation.	Section 7.1 of the MPW Concept Modification RtS
	2.C.3	General comment around noise generated by plant and operational machinery including trucks, container terminal, loading docks etc		
	2.C.5	Concerned importation of fill will negatively impact community and will cause noise pollution		
	2.C.6	Concerned for the noise impacts on residential homes		
	2.C.4	The increase in site level from greater quantities of fill will result in greater impacts from generation, transmissions	The importation of clean general fill and the resulting increased site levels have been considered in the Noise and Vibration Assessment included in Section 7 of the MPW Concept Modification RtS. Overall, the	Section 7.1 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
		and reception of construction and operational noise	importation of clean general fill and the adjustment to the building formation level for the MPW site, under the Amended Modification Proposal, would result in impacts that are generally consistent with those identified in the MPW Concept Approval. These noise impacts are able to be managed through the CEMP and OEMP to be prepared for future stages of development as identified in the REMMs of the MPW Concept Approval.	MPW Concept Approval
	2.C.7	Objects to the noise that will be generated by the extra traffic on Moorebank Avenue	<p>The MPW Concept EIS included an assessment of road traffic noise from the MPW Project on the M5 Motorway, Moorebank Avenue and Anzac Road. This assessment concluded that the MPW Project was expected to either comply with or have a negligible exceedance of the Road Noise Policy (RNP) noise criteria during the daytime and night-time at the nearest receptors, and therefore would not trigger a requirement for road noise mitigation.</p> <p>The assessment undertaken in Section 7 of the MPW Concept Modification RtS, concluded that the Amended Modification Proposal would result in impacts that are generally consistent with those identified in the MPW Concept Approval.</p>	MPW Concept EIS Section 7.1 of the MPW Concept Modification RtS
	2.C.8	Dispute the reports showing the project will have no noise impacts on residents	A <i>Noise and Vibration Impact Assessment</i> was undertaken by SLR Consulting for the MPW Concept Approval. The assessment was in accordance with all relevant NSW Government guidelines and policies, and concluded that Noise levels at the assessed	Section 7.1 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
			<p>receivers would mostly comply with the construction noise management levels (NMLs).</p> <p>As discussed in Section 7.12 of the MPW Concept Modification RtS, a Noise and Vibration Impact Assessment (NVIA) was prepared by Wilkinson Murray, in accordance with all relevant NSW Guidelines and policy for the Amended Modification Proposal.</p> <p>The results of this assessment indicate that during construction, noise levels at the most sensitive residential receivers at the majority of locations would not exceed the established NML (during both standard and extended working hours). The only exceedance is in Casula which is predicted to exceed the established NML by up to 1 dB, which is considered to be imperceptible and would be managed through the preparation and implementation of the CEMP for the relevant stages of construction.</p> <p>The assessment also identified that the Amended Modification Proposal would result in impacts that are generally consistent with those identified in the MPW Concept Approval. These noise impacts are considered to be able to be managed through the CEMP to be prepared relevant stages of development as identified in REMM 1B of the MPW Concept Approval.</p>	

Issue	#	Summary	Comments	Reference
Assessment	2.D.1	The estimated noise levels noted in the assessment as being acceptable are contradicted by Transport for NSW and Sydney Trains Noise logging reports of 2015	The Amended Modification Proposal does not include changes to rail infrastructure associated with the MPW Project. Therefore, a discussion of rail noise along the rail link and Southern Sydney Freight Line is considered to be out of the scope of the Amended Modification Proposal. A detailed assessment of rail noise has however been undertaken and is provided in Section 7 and Appendix D of the MPW Stage 2 RtS.	Section 7 and Appendix D of the MPW Stage 2 RtS
	2.D.3	Noise monitoring is to be reviewed by the secretary of the PAC after 5 years. This seems too infrequent.	<p>It is understood that this comment relates to Condition No. 11 of the MPW Concept Approval, (as determined by DP&E and the PAC), which states that a rail noise monitoring system is to be installed for the rail operations proposed in the MPW Project. This monitoring is to be undertaken annually and reported to the Secretary for a period of 5 years, or as otherwise considered necessary by the Secretary. This period may also be extended at the discretion of the Secretary.</p> <p>The Amended Modification Proposal does not include alteration to the rail activities proposed for the MPW Project. Further, there would be no change to Condition No. 11, with rail monitoring anticipated to commence on operation of the IMEX or interstate as part of Stage 2 of the MPW Project.</p> <p>The results from the noise assessment undertaken in Section 7 of the MPW Concept Modification RtS indicate that the Amended Modification Proposal would not generate any exceedances of relevant operational noise criteria and would be generally</p>	<p>MPW Concept Approval</p> <p>Section 7.1 of the MPW Concept Modification RtS</p> <p>Section 6 of this SRtS</p>

Issue	#	Summary	Comments	Reference
			consistent with the assessment as proposed under the MPW Concept Approval. The REMMs and MPW Concept Approval Conditions of Approval are considered suitable to mitigate the impacts of the Amended Modification Proposal (refer to Section 6 of this SRtS).	
Mitigation	2.E.2	A construction noise and vibration management plan needs to be prepared for the Proposal	As part of the MPW Concept Approval (SSD 5066) (Condition No. D8) REMMs and Minister Conditions of Approval, as revised in Section 8 of this SRtS, a Construction Noise and Vibration Management Plan would be prepared for each stage of the MPW Project prior to construction activities being undertaken.	MPW Concept Approval
	2.E.5	What mitigation will be provided to the people of Casula and Moorebank located 300 meters from the area of impact? Put in the barriers to protect the people from noise.	<p>The results from the noise assessment undertaken in Section 7 of the MPW Concept Modification RtS for the Amended Modification Proposal indicate that during construction, noise levels at the most sensitive residential receivers at the majority of locations would not exceed the established NML (during both standard and extended working hours). The only exceedance is in Casula which is predicted to exceed the established NML by up to 1 dB, which is considered to be imperceptible and would be managed through the preparation and implementation of the CEMP for the relevant stages of construction.</p> <p>The assessment also identifies that the Amended Modification Proposal would result in impacts that are generally consistent with those identified in the MPW Concept Approval. These noise impacts are considered to be able to be managed through the CEMP to be prepared relevant stages of</p>	Section 7.1 of the MPW Concept Modification RtS MPW Stage 2 EIS

Issue	#	Summary	Comments	Reference
			development as identified in REMM 1B of the MPW Concept Approval. A noise barrier is to be installed along the western boundary of the Proposal site for the operation of Stage 2 of the MPW Project, as identified in the MPW Stage 2 EIS.	
Air quality				
Air Quality / Pollution	3.A.1	Increase in air pollution generated by increased congestion and heavy vehicle movements	The Air Quality Impact Assessment (refer to Section 7 of the MPW Concept Modification RtS) was completed for the Amended Modification Proposal.	Section 7.1 of the MPW Concept Modification RtS Section 8 of the MPW Concept Modification RtS
	3.A.2	Concerns that additional heavy vehicles and trains from the Proposal will result in increasing air pollution (in particular diesel emissions, and dust) impacting on nearby residents and the environment	This provides an assessment and comparison of the air quality impacts of the MPW Concept Approval and the Amended Modification Proposal. The results indicate that this activity would comply with all relevant impact assessment criteria and the air quality impacts of the Amended Modification Proposal are generally consistent with those already assessed and approved in MPW Concept Approval.	
	3.A.6	The area and community cannot handle the pollution		
	3.A.7	The increase in diesel trucks will worsen air quality in an area close to schools, nursing homes, retail and a large residential population in an area that is already over polluted and over populated	Mitigation measures identified as part of this assessment are outlined in Section 6 of this SRtS, including those for management of air quality.	
	3.A.8	Please explain in further detail the "very low impacts on the surrounding environment from air pollutants", Table 5 & 6 of the PB EIS dated 20/04/2016 has an annualised emissions quantification which does not appear to be "very low"		

Issue	#	Summary	Comments	Reference
	3.A.9	How will the proposal increase health risks for populations residing adjacent to source points of diesel fuel emissions?	An Air Quality Impact Assessment (refer to Section 7 of the MPW Concept Modification RtS) was completed for the Amended Modification Proposal.	Section 7.1 of the MPW Concept Modification RtS MPW Stage 2 EIS and RtS
	3.A.10	Diesel fumes will be increased as a result of the Proposal	This provides an assessment and comparison of the air quality impacts of the MPW Concept Approval and the Amended Modification Proposal. The assessment included consideration of vehicle emissions and nearby sensitive receivers. The results indicate that this activity would comply with all relevant impact assessment criteria and the air quality impacts of the Amended Modification Proposal are generally consistent with those already assessed and approved in MPW Concept Approval	
	3.A.11	Children and schools nearby will be impacted by increased pollution	The Amended Modification Proposal would not alter the location of diesel emissions and fumes and therefore the conclusion of the MPW Concept Approval remain relevant. Further consideration of health impacts from diesel fumes will be provided within future stages of approval, in particular the MPW Stage 2 EIS and RtS.	

Issue	#	Summary	Comments	Reference
Health				
Pollution / Air Quality	4.A.1	Concerns around emissions from vehicles, trucks and trains that are potentially carcinogenic	A Health Impact Assessment (HIA) and Human Health Risk Assessment (HRA) were prepared by Environmental Risk Services (EnRisks, 2014) on behalf of Parsons Brinkerhoff for the MPW Concept Approval (SSD 5066). The assessment evaluated both direct and indirect impacts of all aspects of the Concept Proposal on the health and wellbeing of the	MPW Concept EIS/RtS/SRtS Section 6 and 7 of the MPW Concept Modification RtS N/A

Issue	#	Summary	Comments	Reference
			<p>community, both regionally and locally (including sensitive receivers such as schools, residential areas and retirement homes) for a construction and an operational scenario for a range of health endpoints, including increased cancer risk.</p> <p>Overall, the HIA found that the potential health risks and impacts presented by the MPW Project, including air emissions from vehicles, trucks and trains would be negligible during construction and low during operation, such that impacts would be managed through the implementation of mitigation and management measures prescribed in the MPW Concept EIS.</p> <p>The Amended Modification Proposal is presented in Section 6 of the MPW Concept Modification RtS. During construction, slightly higher impacts may be encountered through increases of truck-generated air emissions and dust associated with the delivery of additional fill material. These increases have been assessed within Section 7.1.12 of the MPW Concept Modification RtS and were considered to be low and short-term in nature, which would be adequately managed by mitigation measures set out within Section 8 of the MPW Concept Modification RtS.</p> <p>Further, the Amended Modification Proposal would not result in any additional train movements to that assessed under the Approved MPW Concept Approval, therefore the operational assessment undertaken for the MPW Concept Approval remains appropriate and relevant.</p>	

Issue	#	Summary	Comments	Reference
General	4.A.2	Increased pollution will affect people's health particularly young children	<p>As outlined above, a Health Impact Assessment (HIA) and Human Health Risk Assessment (HRA) were prepared by Environmental Risk Services (EnRisks, 2014) on behalf of Parsons Brinkerhoff for the MPW Concept Approval (SSD 5066).</p> <p>The key component included within the Amended Modification Proposal with the potential to impact infant and child health through increased air emissions is the importation of fill material. This activity, as outlined within Section 7.1.12 of the MPW Concept Modification RtS, is expected to generate emissions that are of low risk and short-term in nature, given the implementation of the air pollution mitigation measures detailed in Section 8 of the MPW Concept Modification RtS, (as updated in Section 6 of this SRtS).</p> <p>In summary, as outlined within Section 7.1.12 of the MPW Concept Modification RtS, the implementation of the REMMs approved for the MPW Concept Approval associated with the Amended Modification Proposal would be expected to adequately manage health impacts to the local community, including those more sensitive (e.g. children).</p>	<p>MPW Concept EIS</p> <p>Section 10.4 of the MPW Stage 2 EIS</p> <p>Section 7.1.12 and 8 of the MPW Concept Modification RtS</p> <p>Section 6 of this SRtS</p>
	4.D.3	Concerned about the detrimental health effects of the project on a community predominantly made up of young families		
	4.D.5	Please consider the health of our children in an already polluted environment		
	4.D.8	Please consider the health of our children and grandchildren		
Impacts to community and lifestyle	4.A.3	Impacts to air quality from the project would result in health impacts to nearby schools, childcare centres and homes	As outlined above, a Health Impact Assessment (HIA) and Human Health Risk Assessment (HRA) were prepared by Environmental Risk Services (EnRisks, 2014) on behalf of Parsons Brinkerhoff for the MPW Concept Approval (SSD 5066).	<p>MPW Concept EIS/RtS/SRtS</p> <p>Section 6 and 7 of the MPW Concept Modification RtS</p>

Issue	#	Summary	Comments	Reference
			<p>The assessment evaluated both direct and indirect impacts of all aspects of the Proposal on the health and wellbeing of the community, both regionally and for local sensitive receivers, such as schools, care centres, residential areas and retirement homes for both construction of Early Works and at operational 'full build'.</p> <p>Conclusions from this assessment indicate that, with the implementation of mitigation measures (Refer to Section 7 of the MPW Concept SRtS), the human health impacts to sensitive receivers as a result of the MPW Project would remain within acceptable levels.</p> <p>As noted in Section 7.1 of the MPW Concept Modification RtS, air quality and health impacts generated by this activity have been assessed and considered to be consistent with the MPW Concept Approval, in the presence of mitigation measures set out within Section 8 of the MPW Concept Modification RtS, (as updated in Section 6 of this SRtS).</p>	Section 6 of this SRtS
	4.A.4	Concerns around air pollution and particulates (including diesel particulate matter) from the project resulting in various impacts to health including: Shortened life expectancy, increases outbreaks of asthma, cancer in newborns, lung cancer in children, autoimmune diseases, bronchitis, coronary disease, cardiovascular disease	As outlined above, a Health Impact Assessment (HIA) and Human Health Risk Assessment (HRA) were prepared by Environmental Risk Services (EnRisks, 2014) for the MPW Concept Approval. Overall, the HIA found that the potential health risks and impacts imposed by the MPW Project, including air emissions from vehicles, trucks and trains, would be negligible during construction and low during operation. Impacts would be managed through the	MPW Concept EIS/RtS/SRtS

Issue	#	Summary	Comments	Reference
	4.A.5	Increased impacts to those suffering asthma and other respiratory conditions	implementation of mitigation and management measures prescribed in the MPW Concept SRtS.	
	4.A.7	Concerned the proposal will increase pollution in the local area and affect the community	The Amended Modification Proposal includes the importation of clean general fill material (refer to Section 6 of the MPW Concept Modification RtS Report). This activity may increase truck generated air emissions and dust associated with the delivery of clean general fill material. As outlined within Section 7.1.12 of the MPW Concept RtS, this activity is expected to generate emissions that are of low risk and short-term in nature, with the implementation of the air pollution mitigation measures detailed in Section 8 of the MPW Concept Modification RtS, (as updated in Section 6 of this SRtS).	
	4.A.9	Concerns to residents from increased pollution	As outlined within Section 7.1.12 of the MPW Concept Modification RtS, the implementation of the REMMs approved for the MPW Concept Approval associated with the Amended Modification Proposal would be expected to adequately manage health impacts, including those arising from particulate matter, to the surrounding community.	
	4.A.8	Area cannot handle increase in pollution	Refer to above responses, which provide details of the HIA and HRA undertaken for the MPW Concept EIS, and response 3.A.1, which provides details of the AQIA undertaken for the MPW Concept EIS. Construction activities associated with the Amended Modification Proposal, including the importation of clean general fill, were assessed for air pollution in terms of potential impacts arising from dust, TSP, PM ₁₀ and PM _{2.5} generation. As shown in Table 7-43	Section 7 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
			of the MPW Concept Modification RtS, the maximum predicted increase in annual average PM ₁₀ (1.3 µg/m³), PM _{2.5} (0.5 µg/m³), TSP (1.7 µg/m³) and dust deposition (0.4 g/m²/month) are considered to be minor.	
	4.D.2	General impacts to health and wellbeing of nearby residents not considered in this proposal	<p>A Health Impact Assessment (HIA) and Human Health Risk Assessment (HRA) were prepared by Environmental Risk Services (EnRisks, 2014) on for the MPW Concept Approval to evaluate health and wellbeing impacts associated with the MPW Concept Approval on the community, for a range of health endpoints appropriate to the range of pollutants expected. Overall, the HIA found that the potential health risks and impacts imposed by the MPW Concept Approval, would be negligible during construction and low during operation, such that impacts would be managed through the implementation of mitigation and management measures prescribed in the MPW Concept EIS.</p> <p>An assessment undertaken for the Amended Modification Proposal (refer to Section 7.1.12 of the MPW Concept Modification RtS) assessed that potential health impacts generated as part of the Amended Modification would be consistent with those identified in the MPW Concept Approval, and manageable through implementation of mitigation measures set out in Section 6 of this SRtS.</p>	Section 7 and 8 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
	4.D.4	This project is causing stress for their family worrying about their home and the area they live in	<p>As part of the MPW Concept Approval, an assessment of socio economic impacts generated by the MPW Project was undertaken. Further impact assessment was also undertaken as part of the MPW Concept Modification RtS (refer to Section 7.1.14). It is recognised that social stress and anxiety may be created through uncertainty surrounding the nature of the Amended Modification Proposal and the efforts implemented to mitigate residual impacts.</p> <p>A community engagement plan (CEP) would be prepared for the MPW Project to outline community involvement and consultation activities during construction and operational phases, and to keep members of the local community informed of development activity and made aware of communication channels. This requirement is stipulated in Part C of the MCoAs for the MPW Concept Approval, and would be prepared prior to the commencement of Early Works to the satisfaction of the Secretary.</p>	<p>PW Concept EIS/RtS/SRtS</p> <p>Section 6 and 7 of the MPW Concept Modification RtS</p>
	4.D.7	Project will cause additional stress to residents with no immediate or long-term benefit		
	4.D.9	Potential release of fire-fighting foam products and other unmarked military pollution caches could impact workers and surrounding residents.	<p>s per the MPW Concept Approval, it is intended to remediate the site of former military caches to the extent of known contaminants during Early Works.</p> <p>Prior to the In accordance with Commonwealth Conditions of Approval (EPBC 2011/6086 - Condition 8), SIMTA have engaged a suitably qualified independent expert to prepare a polyfluoroalkyl substances (PFAS) management plan, in</p>	<p>Section 13.3 of the MPW Stage 2 EIS</p> <p>Commonwealth Conditions Approval (EPBC 2011/6086)</p>

Issue	#	Summary	Comments	Reference
			<p>consultation with the NSW EPA Accredited Site Auditor. This plan will:</p> <ul style="list-style-type: none"> • Detail implementation and operational procedures, appropriate to the risk posed by any contamination, including: <ul style="list-style-type: none"> – Management of potential PFAS contaminated sites as yet un-investigated – Management of areas of known PFAS contamination – A contingency action plan for unexpected PFAS contaminant discoveries • Detail soil, groundwater and surface water PFAS contamination monitoring requirements and testing and disposal procedures appropriate to the risk posed by any contamination • Include requirements for site validation reports appropriate to the risk posed by any contamination • Include requirements for remedial action plans appropriate to the risk posed by any contamination • Detail review procedures appropriate to the risk posed by any contamination • Impose the performance measures for managing earthworks and the potential for effects to occur due to disturbance of PFAS contaminated soils during construction. 	

Issue	#	Summary	Comments	Reference
			Areas identified to contain PFAS have been isolated as exclusion zones, until such time that the PFAS management plan is reviewed and approved / accepted by the DoE and the Accredited Site Auditor.	
Sleep disturbance	4.B.1	Sleep disturbance from the Proposal resulting in impacts to human health	<p>An assessment of the noise and vibration impacts of the Amended Modification Proposal is included in Section 7.1.2 of the MPW Concept Modification RtS. Sleep disturbance criteria were established using the EPA's Noise Guide for Local Government. The assessment identified that the predicted noise levels at sensitive receivers are less than, and therefore comply with, sleep disturbance screening levels at all monitoring locations.</p> <p>Further, a health risk assessment for noise levels generated by the Amended Modification Proposal was undertaken and is provided in Section 7.1.12 of the MPW Concept Modification RtS. The assessment indicates that such impacts would be minor and would not result in an increase to human health impacts of the MPW Project identified in the MPW Concept Approval.</p>	Section 7.1.2 and 7.1.12 of the MPW Concept Modification RtS
	4.B.4	How will light pollution impact both human and animal habitats? What mitigation does MIC/ SIMTA propose to the Casula/Moorebank estate in relation to light?	A revised Visual Impact Assessment (VIA) was undertaken to assess additional operational visual and light spill impacts at key sensitive receptors to the west of the MPW site resulting from the Amended Modification Proposal. The assessment found no significant changes to visual or light spill impacts would be generated as a result of the Amended	<p>Section 22 of the MPW Concept EIS</p> <p>Section 7.1.10 of the MPW Concept Modification RtS</p> <p>Section 6 of this SRtS</p>

Issue	#	Summary	Comments	Reference
			<p>Modification Proposal when compared to those initially presented in the MPW Concept Approval.</p> <p>A number of mitigation measures are included within the MPW Concept Approval (REMMs) to mitigate the impacts of light spill from the Proposal (as updated in Section 6 of this SRtS) on the surrounding community, including Casula and Moorebank estate. These measures would include but not be limited to:</p> <ul style="list-style-type: none"> • Design lighting to minimise impacts on surrounding existing and future residents and the proposed conservation zone • Consider use of shields on luminaire lighting to minimise brightness effects • Minimise the quantity of light and energy consumption in parts of the Project site that are not active, while retaining safe operation. <p>In addition to this, an additional REMM has been included for the Amended Modification Proposal to respond to this concern and ensure that directional lighting is directed away from the riparian vegetation adjoining the Georges River as far as practical to reduce impacts to fauna habitat (refer to Section 6 of this SRtS). These REMMs would be considered and implemented, as suitable, as part of future stages of development of the MPW Project.</p>	
Effects of particulate matter	4.E.2	Impacts to health from PM _{2.5} in diesel fumes generated by truck and train movements	The Air Quality Impact Assessment (refer to Section 7 of the MPW Concept Modification RtS) was undertaken for the Amended Modification Proposal to assess and compare the air quality impacts, including	Section 7.1 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
			the predicted annual increase in PM _{2.5} , of the MPW Concept Approval and the Amended Modification Proposal. The shown in Table 7-43 of the MPW Concept Modification RtS, indicate that the maximum predicted increase in annual average PM ₁₀ (1.3 µg/m³), PM _{2.5} (0.5 µg/m³), TSP (1.7 µg/m³) and dust deposition (0.4 g/m²/month) from the Amended Modification Proposal, are minor.	

Issue	#	Summary	Comments	Reference
Natural Environment				
General Environment	5.A.1	The proposal would significantly impact the environment	The MPW Concept EIS (and subsequent approval documentation forming the Approval) includes comprehensive environmental impact assessments for relevant aspects, include traffic and transport, soils and contamination, hydrology and flooding, noise and vibration, air quality, biodiversity and heritage. The MPW Concept EIS also details management measures (refer to Section 28 of the MPW Concept EIS), which would mitigate any potential impacts on the environment. The MPW Concept Modification RtS presents the additional environmental impacts anticipated as a result of the Amended Modification Proposal, in addition to those already identified for the MPW Concept Approval (SSD 5066). As discussed in Section 7 of the MPW Concept Modification RtS, the impacts of the Amended Modification Proposal would be generally consistent with those identified in the MPW Concept Approval and could be managed	Section 28 of the MPW Concept EIS Section 7 and 8 of the MPW Concept Modification RtS
	5.A.2	The environmental impact from the removal of vegetation, remediation works, earthworks and levelling of the site, drainage and utilities installation, construction of the hardstand.		

Issue	#	Summary	Comments	Reference
			through the implementation of the MCoA and the REMMs provided within the MPW Concept Approval and additional mitigation measures identified in Section 8 of the MPW Concept Modification RtS (refer also to Section 6 of this SRtS).	
	5.A.3	Adverse impacts to local wildlife	The MPW Concept Approval (SSD 5066) included an Ecological Impact Assessment (PB, 2014) for the MPW Concept EIS and a separate Biodiversity Offset Strategy prepared as part of the MPE Concept RtS (PB, 2015). Impact significance assessments were undertaken for threatened species populations and threatened ecological communities. The results of these assessments concluded that no threatened species population or threatened ecological community listed under either the Commonwealth EPBC Act or the NSW TSC Act was considered likely to be significantly impacted as part of the MPW Project. In addition, a number of mitigation measures were proposed to reduce and offset impacts. This included retention and enhancement of substantial areas of vegetation along the Georges River riparian corridor (including a permanent conservation area within the MPW site), and implementation of an offset strategy to mitigate unavoidable residual impacts (refer to Section 28 of the MPW Concept EIS). Section 7.1 of the MPW Concept Modification RtS outlines and assesses any additional impacts to flora and fauna values of the design amendments proposed within the Amended Modification Proposal. Minor alterations to the construction footprint, proposed under the Amended Modification Proposal required additional land to be assessed for potential	Section 6 of this SRtS
	5.A.4	Damage to the environment would be unrepairable		
	5.A.5	Project will wipe out native wildlife particularly native birds such as parrots, cockatoos and kookaburras		

Issue	#	Summary	Comments	Reference
			<p>biodiversity impacts. This assessment concluded that no further impacts to native vegetation communities (within or near the MPW site) would occur as a result of this change.</p> <p>In summary, the MPW Concept Approval includes MCoAs and REMMs which remain relevant and would be implemented as part of the Amended Modification Proposal as applicable to the relevant future stages of development. A full list of these REMMs is provided in Section 8 of the MPW Concept Modification RtS (as amended in Section 6 of this SRtS). No additional mitigation measures are required for the construction or operation of the Amended Modification Proposal with regards to biodiversity.</p>	
	5.A.6	<p>66ha of bulk earthworks will be remediated with grass, this would leave it more susceptible to erosion and have a higher mobility potential than other vegetation types. Is there an intention to utilise geotechnical fabrics to minimise erosion? Overland runoff from this area and flooding from the site in general can affect estuary sunlight penetration and can have greater impacts on the Georges River such as bank erosion, turbidity creation, poisoning of marine life etc.</p>	<p>Ministers Conditions of Approval (MCoAs) and REMMs (including those managing erosion and sedimentation) outlined for the MPW Concept Approval remain relevant, and along with additional REMMs outlined in Section 8 of the MPW Concept Modification RtS, would be implemented as part of the Amended Modification Proposal. The relevant REMMs and additional mitigation measures include development of a Stormwater Management Plan tailored to the site and prepared in accordance with the relevant Volumes of the "Blue Book" (Landcom, 2004), an onsite detention system and the use of onsite infiltration such as swale drains and rain gardens across the Project site.</p> <p>It is recognised within the MPW Concept Modification RtS (refer to Section 6 and 7.1.6) that the placement</p>	<p>Section 7.1.6 and 8 of the MPW Concept Modification RtS</p> <p>MPW Stage 2 RtS: Appendix L</p>

Issue	#	Summary	Comments	Reference
			<p>and stabilisation of imported fill would be undertaken as part of Stage 2 of the MPW Project, and would present an intensification of risk to erosion and sedimentation of nearby waterways, when compared to the MPW Concept Approval.</p> <p>In addition to mitigation strategies previously mentioned (for the MPW Concept Approval), further temporary stabilisation methods are outlined for Stage 2 of the MPW Project (refer to MPW Stage 2 RtS: Appendix L Stockpile Management Protocol), which relate to erosion and sedimentation control. Stabilisation methods, as stated, may include hydro-seed/hydro mulch or bitumen emulsion among others. These measures would be applied to the bulk earthworks area for any area subject to stockpiling for more than a 10-day period without being worked on. The application method selected would be determined by the estimated period of surface inactivity.</p>	
	5.A.7	The artificial gradient that will be created for run off given the intended extra elevation of the site. How will the added gradient affect surrounding vegetated areas?	The drainage design for both construction and operation of the MPW site would maintain existing flow regimes when compared to pre-development conditions (refer to Section 12 of the MPW Stage 2 EIS). This design takes account of the gradient generated by raising the site to achieve desired site levels for drainage purposes. and would be achieved in part through the design and installation of appropriately located sedimentation basins and outlet channels designed to convey flows from the basins to the Georges River.	<p>Section 8 of the MPW Concept Modification RtS</p> <p>Section 12 of the MPW Stage 2 EIS</p>

Issue	#	Summary	Comments	Reference
			The outlets have been designed to minimise impacts associated with stormwater runoff generated by the Proposal on surrounding vegetation and to the Georges River. The areas to be disturbed for the channels would be re-contoured and partially revegetated upon completion of the basin outlets to enable habitat connectivity.	
Impact on local river systems	5.B.1	Concerned the project will negatively impact South-West river systems	A surface water impact assessment was undertaken by PB (2014) for the MPW Concept Approval (refer to Section 16 of the MPW Concept EIS). Overall, the recommendations for further assessment of potential drainage and flood impacts as part of future stages, outlined in mitigation measures for the MPW Concept EIS have been included within Section 8 of the MPW Concept Modification RtS Report. Drainage design for both construction and operation would aim to maintain existing flow regimes, provide a design that generates runoff from the site to pre-development levels up to the 1% AEP flood level, and complies with the relevant objectives of the ANZECC Water Quality Guidelines. The Amended Modification Proposal includes the importation of clean general fill, as part of Stage 2 of the MPW Project. The MPW Concept Modification RtS document provides additional assessment to identify and manage additional environmental risk associated with this activity, which include a minor intensification of those identified for the MPW Concept Approval. Results from this study indicated that all stormwater and flooding impacts associated with the Amended Modification Proposal up to the 1%	Section 16 of the MPW Concept EIS Section 7 and 8 of the MPW Concept Modification RtS Section 7 of this SRtS
	5.B.2	Concerned the project will cause major degradation/damage to the Georges river		
	5.B.7	Concerned the proposal will cause pollution to the local river systems		
	5.B.9	Redirection of waterways will cause ANZAC and Harris creeks to dry up		

Issue	#	Summary	Comments	Reference
			AEP event are negligible, with a predicated 0.01m predicted increase in the PMF Events. Additional measures outlined in Section 8 of the MPW Concept Modification RtS would be implemented to manage drainage and flood risk posed by the Amended Modification Proposal (refer to Section 6 of this SRTS).	
	5.B.3	Objects to use of prime public riverfront for an industrial project and its alienation from public use	The Approved MPW Concept included consideration of aspects regarding site suitability and site selection. As noted, a permanent dedicated conservation area would provide a significant buffer to the MPW site from key receivers in the residential areas of Casula and Glenfield. Site selection is not considered within the scope of the Amended Modification Proposal.	MPW Concept EIS
	5.B.5	Project should not be situated so close to an environmentally sensitive area such as the Georges River		
	5.B.6	Area should be used to beautify Georges River rather than for industrial uses	The Approved MPW Concept included consideration of aspects regarding site suitability and site selection. As noted, a permanent dedicated conservation area would provide a significant buffer to the MPW site from key receivers in the residential areas of Casula and Glenfield. Site selection is not considered within the scope of the Amended Modification Proposal.	MPW Concept EIS
Aboriginal/European Heritage	5.D.1	The spur line proposal is across land that is currently occupied by Glenfield Waste Services and used as a waste landfill site, which so far has been used as an excuse to ignore visual impacts to Glenfield Farm, even though this landfill site is temporary and was to be remediated and returned to public use land, under the National Parks and	The tie-in of the Rail link to the SSFL, which crosses the Glenfield Waste Facility, is approved to be constructed and operated under the MPE Stage 1 Project (SSD14-6766). The MPW Project would utilise this Rail link for operational purposes. The Rail link is to be constructed and commissioned prior to the operation of the MPW Project and therefore the visual impact of the Rail link is not assessed as part of this application.	N/A

Issue	#	Summary	Comments	Reference
		Wildlife service control. This land remains an important part of the visual curtilage of Glenfield Farm.	Further, the Amended Modification Proposal does not seek to alter the use of the Rail link proposed as part of the MPW Project.	
	5.D.2	Historic Glenfield farm buildings listed as being of exceptional importance to the state of NSW would have their views disrupted	<p>Potential visual impacts regarding the views from Glenfield Farm are not considered to impact on the heritage context of the property as views from the site are not considered to be a significant contributor to the values and characteristics of the site.</p> <p>Notwithstanding, a Visual Impact Assessment (VIA), prepared by Clouston Associates, and a detailed light spill assessment, prepared by AECOM, were undertaken to inform the MPW Concept EIS. The viewpoints selected for the study include the southern and northern sections of Leacock Regional Park, both located within close proximity to Glenfield Farm, looking across Glenfield Waste Facility toward the Proposal site (viewpoints 1 and 2). The results of this assessment indicate that at full-build, the visual impacts would range from moderate (viewpoint 1) to moderate/high (viewpoint 2), with direct views to the MPW site.</p> <p>Further impact assessment was undertaken for the MPW Concept Modification RtS (refer to Section 7.1.10), using the same viewpoints as those selected for the MPW Concept EIS to maintain consistency (refer to Section 7.1.10 of the MPW Concept Modification RtS). The results from this assessment indicate that operational visual impacts are predicted to range from moderate (viewpoint 1) to moderate/high (viewpoint 2) as a result of the Amended Modification Proposal (i.e. indicating similar</p>	Section 7.1 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
			<p>degree of impact when compared to the MPW Concept Approval assessment).</p> <p>These visual impacts would be mitigated through the implementation of management measures in accordance with the REMMs (refer to Section 6 of this SRtS) and are considered acceptable based on the distance of the site from surrounding receivers, vegetation to be retained and topography of the area.</p>	
	5.D.3	<p>The interest in the land currently occupied by Glenfield landfill is posed by Glenfield Farm to have had its visual curtilage completely ignored in this deal, which should now be exposed to proper public and planning scrutiny as part of the modification application process. Any voluntary agreement made in respect of this land should have included the interest in it held by Glenfield Farm's visual curtilage and the owners should have been consulted</p>	<p>The tie-in of the Rail link to the SSFL, which crosses the Glenfield Waste Facility, is approved to be constructed and operated under the MPE Stage 1 Project (SSD14-6766). The MPW Project would utilise this Rail link for operational purposes. The Rail link is to be constructed and commissioned prior to the operation of the MPW Project and therefore the visual impact of the Rail link is not assessed as part of this application.</p> <p>A revised Visual Impact Assessment (VIA) was undertaken to assess additional operational visual impacts to key sensitive receptors to the west of the MPW site resulting from the Amended Modification Proposal. The assessment found the visual impacts generated as a result of the Amended Modification Proposal were generally consistent those initially presented in the MPW Concept Approval (refer to Section 7 of the MPW Concept Modification RtS).</p> <p>The Amended Modification Proposal does not seek approval, or to modify the existing MPW Concept Approval, for any elements of the MPW Project associated with the Glenfield Waste Facility. The references included within this submission to</p>	<p>Section 7 of the MPW Concept Modification RtS</p>

Issue	#	Summary	Comments	Reference
			Glenfield Waste Facility are therefore outside of the scope of the Amended Modification Proposal and not considered further.	
	5.D.4	The acoustic impacts will cause grave issues of liveability to Glenfield Farm along with ruining its horizon viewpoint	<p>A Noise and Vibration Assessment (refer to Section 7 of the MPW Concept Modification RtS) provides a comparison of changes from the MPW Concept Approval to the Amended Modification Proposal. The assessment found that the Amended Modification Proposal would not alter the potential impacts.</p> <p>The results from the assessment undertaken in Section 7 of the MPW Concept Modification RtS indicate that the impacts of the Amended Modification Proposal would be generally consistent to those identified in the MPW Concept Approval. REMMs and CoA's included in the MPW Concept Approval, as amended in Section 6 of this SRtS, would minimise the noise impact of the MPW Project (and Amended Modification Proposal) on the surrounding community.</p> <p>Additionally, a visual impact assessment was undertaken for the MPW Concept Modification RtS (refer to Section 7.1.10), using the same viewpoints as those selected for the MPW Concept EIS to maintain consistency (refer to Section 7.1.10 of the MPW Concept Modification RtS). (The viewpoints selected for the study include the southern and northern sections of Leacock Regional Park, both located within close proximity to Glenfield Farm, looking across Glenfield Waste Facility toward the Proposal site). The results from this assessment indicate that operational visual impacts are predicted</p>	<p>Section 7 of the MPW Concept Modification RtS</p> <p>Section 6 of this SRtS</p>

Issue	#	Summary	Comments	Reference
			to range from moderate (viewpoint 1) to moderate/high (viewpoint 2) as a result of the Amended Modification Proposal (i.e. indicating similar degree of impact when compared to the MPW Concept Approval assessment). These visual impacts would be mitigated through the implementation of management measures in accordance with the REMMs (refer to Section 6 of this SRtS) and are considered acceptable based on the distance of the site from surrounding receivers, vegetation to be retained and topography of the area.	
Bushfire	5.E.1	The southern aspect of the site will present a bushfire threat as it has sloped indexed land which under the right temperature and wind direction could pose a problem to residents who have to evacuate through 1 main entry/exit point on Wattle Grove Road	As outlined in Section 1.2 of the MPW Concept Modification RtS, the suburb of Wattle Grove is over 670 metres to the east of the MPW site, buffered by both the MPE site and Commonwealth owned vegetation (referred to as the Boot Land). In the event of a bushfire, evacuation routes for Wattle Grove residents would not be impeded by the MPW Project (or the Amended Modification Proposal).	Section 1.2 of the MPW Concept Modification RtS
Pollution	5.F.2	Increase in site level from the fill will result in great distribution of lighting impacts to local residents	A revised Visual Impact Assessment (VIA) was undertaken to assess additional operational visual and light spill impacts resulting from increased building heights for the Amended Modification Proposal (refer to Section 7 of the MPW Concept Modification RtS). This assessment considered key sensitive receptors surrounding the site, in particular, to the west of the MPW site. The assessment found no significant changes to visual or light spill impacts would be generated as a result of the Amended Modification Proposal when compared to those initially presented in the MPW Concept Approval.	MPW Concept EIS (Technical Papers 12 and 13) Section 7 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
			This impact is considered to be generally consistent with the assessment as approved under the MPW Concept Approval.	
	5.F.4	Increase in building heights will increase noise, light and pollution to local residents	<p>Increases to building height, included within the Amended Modification Proposal was identified and assessed as part of Section 7 of the MPW Concept Modification RtS.</p> <p>As outlined in Section 7.1.10, an additional VIA was prepared by Reid Campbell (2016) to assess potential additional impacts generated by this change. Three viewpoints were selected representative of the most sensitive visual receivers in Casula to assess additional visual impact. The assessment concluded that the Amended Modification Proposal would be generally consistent with the visual landscape assessed as part of the MPW Concept Approval. The outcomes and recommendations of the assessment undertaken for the MPW Concept Approval (SSD 5066) are considered relevant and appropriate for the Amended Modification Proposal.</p> <p>Additional noise and light spill impact generated by this Amended Modification Proposal would be imperceptible, as identified within the MPW Concept Modification RtS.</p>	MPW Concept EIS Section 7 of the MPW Concept Modification RtS
Flooding	5.G.1	Uncaptured flows from the eastern side of the site will negatively impact Anzac creek	A surface water impact assessment was undertaken by PB (2014) for the MPW Concept Approval (refer to Section 16 of the MPW Concept EIS). Overall, recommendations for further assessment of potential drainage and flood impacts as part of future stages	Section 16 of the MPW Concept EIS Section 8 of the MPW Concept Modification RtS
	5.G.2	Increasing site level will increase flooding impacts to surrounding areas		

Issue	#	Summary	Comments	Reference
	5.G.3	New concrete yards and large shed and general increase in sealed areas will displace rainwater and increase flood danger for surrounding residents and areas	are outlined in mitigation measures included within the MPW Concept EIS, which have been included within Section 8 of the MPW Concept Modification RtS. Drainage design for both construction and operation would aim to maintain existing flow regimes, provide a design that generates runoff from the site to pre-development levels up to the 1% AEP flood level, and complies with the relevant objectives of the ANZECC Water Quality Guidelines.	Section 6 of this SRtS
	5.G.4	Proposal will change the whole nature of the flood zone and Georges River catchment, resulting in more flooding and spreading pollution further		
	5.G.6	If the site were flooded contamination would run off and potentially harm and kill previously thought extinct <i>Hibbertia fumana</i>	The Amended Modification Proposal includes the importation of clean general fill, to be imported as part of Stage 2 of the MPW Project. The MPW Concept Modification RtS document provides additional assessment to identify and manage additional environmental risk associated with this activity, which include a minor intensification of those identified for the MPW Concept Approval. Results from this study indicated that all stormwater and flooding impacts associated with the Amended Modification Proposal up to the 1% AEP event are negligible, with a predicated 0.01m predicted increase in the PMF events.	
	5.G.7	Importation of 2 million tons of fill will change the entire water flow and flood plain area		
	5.G.8	No plans to create a site for the backed up flood waters to retreat to	As discussed in Section 7.2 of the MPW Concept Modification RtS, the impacts of the Amended Modification Proposal would be generally consistent with those identified in the MPW Concept Approval and would be managed through the implementation of the MCoA and the REMMs provided within the MPW Concept Approval and additional mitigation measures outlined in Section 8 of the MPW Concept	

Issue	#	Summary	Comments	Reference
			Modification RtS (as amended in Section 6 of this SRtS).	
	5.G.11	It is essential that a full flood modelling study is carried out in respect of this modification proposal	A surface water impact assessment, including flood modelling, was undertaken by PB (2014) for the MPW Concept Approval (refer to Section 16 of the MPW Concept EIS). Overall, the recommendations for further assessment of potential drainage and flood impacts as part of future stages, outlined in mitigation measures for the MPW Concept EIS, have been included within Section 8 of the MPW Concept Modification RtS Report. The Amended Modification Proposal includes the importation of clean general fill, as part of Stage 2 of the MPW Project.	Section 16 of the MPW Concept EIS Section 7 and 8 of the MPW Concept Modification RtS Section 6 of this SRtS
	5.G.13	Has concerns regarding the Hydrographical implications regarding volumes and quality of run-off in a wet weather event, especially as a number of drains have volume constraints	Additional measures outlined in Section 8 of the MPW Concept Modification RtS would be implemented to manage drainage and flood risk posed by the Amended Modification Proposal (refer to Section 6 of this SRtS).	
	5.G.10	The area proposed for the Moorebank Intermodal is located on the primary floodplain for the Georges River. According to a paper entitled "Have We Forgotten About Flooding on the Georges River?" presented at the 2001 Floodplain Management Authorities Conference at the Wentworth Shire Council, planning considerations need to be made for a maximum flood, which can	As outlined in Section 6.5.1 of the MPW Concept Modification RtS, the Amended Modification Proposal includes the importation of clean general fill to adjust building formation levels to ensure that the MPW Project operations are elevated above the medium and high risk flood zones of the Georges River catchment. Site drainage on the MPW site would be designed to convey flows from the 10% AEP flood (i.e. a one in ten chance of occurring in any year), in accordance	Section 6.5 of the MPW Concept Modification RtS Section 7 of this SRtS

Issue	#	Summary	Comments	Reference
		be up to 5 metres higher than the 100-year flood, which is 10.5 metres.	with the LCC Drainage Design Specification Section D5.04. For events above the 10% AEP, the MPW site would be designed to safely convey overland flow to the detention ponds which would be designed to attenuate the runoff from the site to pre-development levels up to the 1% AEP flood level (i.e. a 100-year flood). Further, as identified in the MPW Concept Modification RtS, all stormwater and flooding impacts associated with the Amended Modification Proposal up to the 1% AEP event are negligible, with a predicated 0.01m predicted increase in the PMF Events.	
	5.G.14	Concerned regarding design inefficiency of the drains and flood plain run-off on site, are the inlet pits screened for protection, if so what blocking mechanisms are in place? Were blockages accounted for in design? What measures for blockage mitigation exist?	<p>As discussed in Appendix B of the MPW Concept Modification RtS (Stormwater and Flooding Addendum), the stormwater and flooding impacts resulting from the Amended Modification Proposal are considered to be generally consistent with those presented in the MPW Concept Approval. Further, a detailed Stormwater and Flooding Impact Assessment has been undertaken as part of the MPW Stage 2 EIS (Appendix R) (SSD 16_7709), which is representative of the conditions proposed under the Amended Modification Proposal.</p> <p>As discussed in Section 16 of the MPW Concept EIS, Water Sensitive Urban Design (WSUD) principles are to be incorporated into the stormwater and drainage detailed design of the MPW site. These measures would be designed to ensure that stormwater runoff achieves water quality targets of a neutral or beneficial effect (NoBE) and would include in line</p>	<p>Section 12.4 of the MPW Stage 2 EIS</p> <p>Section 16 of the MPW Concept EIS</p>

Issue	#	Summary	Comments	Reference
			gross pollutant traps (GPTs) and rain gardens in the base of the onsite stormwater detention basins. These devices would provide screening to prevent debris from entering the Georges River via the site's drainage system, and would be maintained regularly to remove any blockages that may occur to maintain efficiency of the WSUD system.	
Fill	5.H.2	Fill is only being added in an effort to avoid site remediation, due to contamination and dangerous materials left behind by the army	As outlined in Section 6.5.1 of the MPW Concept Modification RtS, the Amended Modification Proposal includes the importation of clean general fill to adjust building formation levels to optimise drainage design across the site and to avoid potential for encountering unexpected contamination. Refer to Section 6.5.1 of the MPW Concept Modification RtS for detailed justification of this activity. Remediation activities for the MPW site would be conducted under the MPW Early Works and MPW Stage 2 Approvals.	Section 6.5.1 of the MPW Concept Modification RtS
	5.H.3	2.2 million cubic meters of landfill is untested, land should be remediated instead	The Amended Modification Proposal includes the importation of approximately 1.6 million cubic metres of fill to the MPW site (refer to Section 3 of the MPW Concept Modification RtS). The fill used will be "clean general fill". This fill refers to material meeting the NSW EPA's resource recovery orders and exemptions including but not limited to Excavated Natural material (ENM) and Virgin Excavated Natural Material (VENM), according to EPA definitions for these materials. See additional mitigation measure provided within Section 8 of the MPW Concept Modification RtS (regarding contamination and soils).	Section 3 of the MPW Concept Modification RtS
	5.H.7	Proposed dirt may contain bio hazards and foreign matter		Section 8 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
			Remediation activities for the MPW site would be conducted under the MPW Early Works and MPW Stage 2 Approvals.	
	5.H.4	The fill will likely cover rare botanical specimens, aboriginal sites and cause un-remediated contamination	The Amended Modification Proposal includes the importation of approximately 1.6 million cubic metres of clean general fill to the MPW site (refer to Section 3 of the MPW Concept Modification RtS). The fill used will be "clean general fill". This fill refers to material meeting the NSW EPA's resource recovery orders and exemptions including but not limited to ENM and VENM, according to EPA definitions for these materials. Impacts to biodiversity, heritage and contamination associated with the importation and placement of fill have been assessed in Section 7.1 of the MPW Concept Modification RtS. The impacts of the Amended Modification Proposal would be generally consistent with those identified in the MPW Concept Approval and would be managed through the implementation of the MCoA and the REMMs provided within the MPW Concept Approval and additional mitigation measures identified in Section 8 of the MPW Concept Modification RtS (refer also to Section 6 of this SRtS).	Section 3 and 6.3 of the MPW Concept Modification RtS 7.1 and Section 8 of the MPW Concept Modification RtS Section 6 of this SRtS
	5.H.9	Land fill importation will destroy the ecology of the area, especially Georges river		
	5.H.5	If 600,000 tonnes of fill is required then the site is not suitable for the original application.	The Amended Modification Proposal includes the importation of approximately 1.6 million cubic metres of fill to the MPW site (refer to Section 3 of the MPW Modification RtS), to adjust building formation levels to optimise drainage design across the site and to avoid potential for encountering unexpected contamination.	Section 7.2 of the MPW Concept Modification RtS
	5.H.6	Objects to the modification of 600,000 cubic metres of fill		

Issue	#	Summary	Comments	Reference
			<p>The importation of clean general fill is proposed as a key component of the Amended Modification Proposal. This forms part of the modification to the MPW Concept Approval (SSD 5066) and is considered to be substantially the same development under section 96(2) of the EP&A Act (refer to Section 7.2 of the MPW Concept Modification RtS).</p>	
	5.H.11	Importation of fill should have been mentioned in previous applications	<p>The MPW Concept EIS, prepared by PB (2014) concluded a cut to fill balance across the MPW site. Section 8 of the MPW Concept EIS states “it is important to note that, should the Project be granted Stage 1 SSD approval, detailed engineering studies would be prepared to determine the optimal design for the Project”. Progressive detailed design (i.e. “detailed engineering studies”) undertaken by Arcadis has determined that the importation of clean general fill to adjust the building formation level is required for the functionality of the internal site drainage system.</p> <p>A detailed impact assessment has been provided for this importation of clean general fill as part of the MPW Modification Report and MPW Concept Modification RtS and is further addressed within the MPW Stage 2 EIS. Mitigation measures have been included at both a Concept Approval level and stage level to manage and minimise the potential environmental impacts of this importation of clean general fill to the MPW site.</p> <p>The Amended Modification Proposal includes a development which is ‘substantially the same’ as that provided within the MPW Concept Approval in that it would facilitate for the development of an intermodal</p>	<p>MPW Concept EIS/RtS/SRtS</p> <p>MPW Concept Modification Report/RtS/SRtS</p>

Issue	#	Summary	Comments	Reference
			terminal facility with the same IMT throughput limitations, warehousing GFA, freight village, truck parking and other ancillary development as provided within the MPW Concept Approval. .	
Visual	5.I.3	There is a failure to identify and address impacts of the raised site on the important visual curtilage of historic Glenfield Farm across the spur line site and the Intermodal site across the Georges River. There is also a major polluting, noisy and extensive crushing operation that was also not described in the MPW Concept Plan approval. For these reasons the modification proposal to be rejected.	Potential visual impacts regarding the views from Glenfield Farm are not considered to impact on the heritage context of the property as views from the site are not considered to be a significant contributor to the values and characteristics of the site. Notwithstanding, a Visual Impact Assessment (VIA), prepared by Clouston Associates, and a detailed light spill assessment, prepared by AECOM, were undertaken to inform the MPW Concept EIS. The viewpoints selected for the study include the southern and northern sections of Leacock Regional Park, both located in close proximity to Glenfield Farm, looking across onto the Proposal site (viewpoints 1 and 2). The results of this assessment indicate that at full-build, the visual impacts would range from moderate (viewpoint 1) to moderate/high (viewpoint 2), with direct views to the MPW site.	MPW Concept EIS Section 7.1 of the MPW Concept Modification RtS
	5.I.4	Raising the site by 2 meters will further impacts on the visual capital held by Glenfield farm	Further impact assessment was undertaken for the MPW Concept Modification RtS (refer to Section 7.1.10), using the same viewpoints as those selected for the MPW Concept EIS to maintain consistency (refer to Section 7.1.10 of the MPW Concept Modification RtS). The results from this assessment indicate that operational visual impacts are predicted to range from moderate (viewpoint 1) to moderate/high (viewpoint 2) as a result of the Amended Modification Proposal (i.e. indicating similar	

Issue	#	Summary	Comments	Reference
			<p>degree of impact when compared to the MPW Concept Approval assessment). These visual impacts are to be further mitigated in accordance with the REMMs (refer to Section 6 of this SRtS) and are considered acceptable based on the distance of the site from surrounding receivers, vegetation to be retained and topography of the area.</p> <p>The inclusion of materials crushing plant was provided within the MPW Concept Modification Report (June, 2016). This plant would be used to recycle material that is acceptable for reuse from the demolition of buildings (demolished during the Early Works) and to crush and sort any large material brought to site during the importation of fill material (during the MPW Stage 2 Proposal).</p> <p>As outlined within Section 7.1.2 of the MPW Concept Modification RtS, crushing activities would be restricted to standard construction hours, and noise levels would be below criteria during all construction works periods at all receivers modelled, with the exception of a 1dB exceedance in Casula during bulk earthworks activities. As outlined in Table 8-17 of the MPW Stage 2 EIS, total sound power levels (LAeq, 15 min) for this phase of construction would be made up of a wide range of plant and equipment, of which the crushing plant is 4 dB below the loudest. It is therefore concluded that the crushing plant would contribute only a minor amount to the overall 1dB exceedance, which in itself is considered imperceptible and would be managed through the</p>	

Issue	#	Summary	Comments	Reference
			Construction Noise Management Plan for the relevant stage of the development.	
	5.I.5	Does in the increase in height of building decrease the visual amenity of the buildings? And does it comply with Liverpool Local Environment Plan 2008?	<p>Section 7.1.10 of the MPW Concept Modification RtS provides an assessment of visual impacts generated as a result of the changes to maximum building heights from the Amended Modification Proposal. A Statement of Development Standard Exception (refer to Appendix D of the MPW Concept Modification RtS) was also prepared to facilitate an exception to the development standard (clause 4.6 of the <i>Liverpool Local Environmental Plan 2008</i> (Liverpool LEP 2008) regarding maximum building heights related to adjustment of the building formation level (in as required by the <i>Liverpool Local Environmental Plan 2008</i>).</p> <p>The assessment concluded that the Amended Modification Proposal would result in visual landscape that is consistent with that already assessed as part of the MPW Concept Approval. As a result, the adjusted building formation levels and therefore building heights is not considered to result in a decrease in the visual amenity of the buildings proposed for the MPW site.</p>	Section 7.1.10 and Appendix D of the MPW Concept Modification RtS
Planning Process				
Approvals	6.A.2	The approvals process has not be undertaken correctly and is not transparent, lodging 3 applications proposal 3 days prior to Christmas is underhanded.	As outlined within Section 1 of this SRtS, the approvals process for the MPW Concept Approval and subsequent Modification Application, which is the subject of this report, has been undertaken in	Section 1 of this SRtS

Issue	#	Summary	Comments	Reference
			<p>accordance with relevant requirements under both the EP&A Act and the EP&A Regulations.</p> <p>The lodgement and exhibition timeframes for these documents is considered transparent and above standard requirements for public exhibition. An extended exhibition period of over 10 weeks (14 December 2016 to 24 February 2017) was provided by DP&E to account for the Christmas period and concurrent documentation. The minimum exhibition period for such documentation is 30 days.</p>	
	6.A.3	Proposal should not be approved because reconfiguring the internal road network to allow Moorebank Avenue to be redirected around the eastern side of the site is underhanded	<p>The MPW Amended Modification Proposal does not seek approvals for a reconfiguration of an internal road network to facilitate the redirection of Moorebank Avenue.</p> <p>Any re-alignment of Moorebank Avenue would be subject to appropriate planning approvals and public exhibition in the future</p>	N/A
	6.A.4	Objects to all aspects of the proposal being approved	<p>The MPW Concept has been approved and provides the basis for the Amended Modification Proposal. The MPW Concept Approval includes MCoAs and REMMs which remain relevant and would be implemented as part of the Amended Modification Proposal as applicable to the relevant future stages of development (refer Section 6 of this SRtS).</p>	<p>MPW Concept EIS/RtS/SRtS</p> <p>MPW Concept Modification Report/RtS/SRtS</p>
	6.A.5	This proposal and the entire project should be stopped completely		
	6.A.6	3 new modification applications invalidates any previous EIS findings and results, a new EIS needs to be produced to include these modifications	<p>The three Proposal applications lodged concurrently include:</p> <ul style="list-style-type: none"> • MPW Concept Modification RtS • MPE Stage 2 EIS (not relevant to this SRtS) 	<p>Section 7.2 of the MPW Concept Modification RtS</p>
	6.A.9	Objects to managing 3 modifications at the same time, it puts the community at a		

Issue	#	Summary	Comments	Reference
		disadvantage to review thoughtfully each proposal and is intended to overwhelm the community and reduce meaningful community responses	<ul style="list-style-type: none"> MPE Concept Plan Modification Report (not relevant to this SRtS) <p>The MPW Concept Modification Report was prepared to build upon the assessments and findings of the previously approved MPW Concept Approval documentation, by presenting design changes made in response to updated information and design development. The purpose of the MPW Concept Modification RtS is to respond to submissions received during the June 2016 exhibition of the MPW Concept Modification Report. As per the Amended Modification Proposal justification provided in Section 7.2 of the MPW Concept Modification RtS, a separate EIS to account for these changes is not considered necessary.</p> <p>The impacts of the Amended Modification Proposal would generally be consistent with those identified in the MPW Concept Approval and would be managed through the implementation of the MCoA and the REMMs provided within the MPW Concept Approval and additional mitigation measures identified in Section 8 of the MPW Concept Modification RtS (refer also to Section 6 of this SRtS).</p>	
	6.B.6	Reading and understanding 81 documents at the same time to understand and make considered objections to the proposal is unfair and constitutes inadequate consultation		
	6.A.7	The application is a major modification to the concept and should be rejected	As per the justification provided in Section 1.6 and 7.2 of the MPW Concept Modification RtS, the Amended Modification Proposal proposes a development which is 'substantially the same' as that approved by the MPW Concept Approval, in that it would facilitate for the development of an intermodal terminal facility with the same IMT throughput	Section 1.6 and 7.2 of the MPW Concept Modification RtS
	6.A.15	Proposed modification is of massive not minor environmental impact, on these grounds the application should be rejected "The consent authority must first consider whether the proposed		Section 7 of this SRtS

Issue	#	Summary	Comments	Reference
		modification is of minimal environmental impact." [Environmental and Planning Law in New South Wales, Lyster, Lipman, Franklin, Witten, & Pearson, Chapter 4, Developmental Control, Lapse, Modification and Revocation, pg. 109]	limitations, warehousing GFA, freight village, truck parking and other ancillary development as provided within the MPW Concept Approval. The Amended Modification Proposal is considered substantially the same development and can be considered for approval as a modification under s96(2) of the EP&A Act.	
	6.B.2	Concerned that if this large a modification is required then the original proposal is flawed and should be thrown out	A detailed environmental impact assessment of the Amended Proposal is provided within Section 7 of the MPW Concept Modification RtS, which concluded that the impacts of the Amended Modification Proposal would generally be consistent with those identified in the MPW Concept Approval. The implementation of REMMs (as amended in Section 6 of this SRtS) and the MCoA for the MPW Concept Approval would further reduce the impact of the Amended Proposal on the surrounding environment and community.	
	6.B.3	This is not a modification but a whole new development		
	5.I.1	Concerned there will be a reduction in visual amenity for elevated receivers in Casula	As outlined in Section 7.1.10 of the MPW Concept Modification RtS, an additional VIA was prepared by Reid Campbell (2016) to assess potential additional impacts generated by the Amended Modification Proposal. Three viewpoints were selected representative of the most sensitive visual receivers in Casula to assess additional visual impact. The assessment concluded that the Amended Modification Proposal would not result in significant changes to the visual landscape assessed as part of the MPW Concept Approval. The outcomes and recommendations of the assessment undertaken for the MPW Concept Approval (SSD 5066) are still	MPW Concept EIS Section 7.1 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
			considered relevant and appropriate for the Amended Modification Proposal.	
	6.A.8	The greens proposal to place intermodal terminals on the periphery of the cities and use both Port Kembla and Newcastle ports along with port botany to distribute freight fairly and with less environmental destruction	<p>The MPW Concept EIS included consideration of the current site and potential alternative sites.</p> <p>There has been strong and consistent support at State and Commonwealth Government levels for the development of an IMT in Moorebank. The MPW Stage 2 site has been earmarked by the NSW and Australian Governments as a highly suitable location for an IMT in both freight and distribution strategy and there is demonstrable demand for an IMT within the area (refer to Section 3 of the MPW Stage 2 EIS). Development of the land for the purposes of an IMT is therefore considered the most suitable and highest and best use for the land. The Commonwealth and State governments have further endorsed the development of an IMT on the MPW site through granting approvals including the MPW EPBC Approval (No. 2011/6086) and the MPW Concept Approval (SSD 5066).</p> <p>Mitigation measures are included within the MPW Concept SRtS, MPW Stage 2 EIS and the MPW Concept Modification RtS to minimise the impact of the MPW Project on the surrounding environment and community.</p> <p>Other locations for the development are therefore not considered relevant at this stage of approval.</p>	<p>MPW Concept EIS/RtS/SRtS</p> <p>MPW Concept Modification Report/RtS/SRtS</p> <p>MPW Stage 2 EIS/RtS</p>
	6.A.11	The planning department should reject all applications and a new fully costed precinct master plan should be	The MPW Concept environmental approvals documentation (i.e. the EIS, RtS and SRtS) and the MPW Concept Modification Report/RtS/SRtS, have	MPW Concept EIS/RtS/SRtS

Issue	#	Summary	Comments	Reference
		developed, one that includes late additions and factors in the RMS traffic impact study, PAC etc due to the new modifications	<p>been prepared in accordance with the relevant legislation.</p> <p>Further, detailed impact assessments, discussions and ongoing consultation with Transport for NSW (TfNSW)/Roads and Maritime has been undertaken progressively for the MPW Project, MPW Concept Modification (and Amended Modification) and Stage 2 of the MPW Project (refer to Section 6.4.1 for consultation activities). In particular, these assessments have considered the impacts of traffic at both a project level and as part of a cumulative impact assessment. The information provided is consistent with the level of detail required for each stage of development by the DP&E in accordance with the EP&A Act.</p>	<p>MPW Concept Modification Report/RtS/SRtS</p> <p>MPW Stage 2 EIS/RtS</p>
	6.A.12	Opposed to operational movements between MPE and MPW	<p>Details regarding the operational movements between the MPE and MPW sites is included in Section 4 of the MPW Stage 2 EIS.</p> <p>A detailed description of the components of the Amended Modification Proposal is provided in Section 6 of the MPW Concept Modification RtS, and an environmental assessment and justification of each component is provided in Section 7 of the same report. Overall, the assessment identifies that the Amended Modification Proposal would, subject to the implementation of updated mitigation measures (refer to Section 8 of this MPW Concept Modification RtS), result in environmental impacts that are generally consistent to those identified within the MPW Concept EIS/RtS/SRtS.</p>	<p>Section 6 and 7 of the MPW Concept Modification RtS</p> <p>Section 4 of the MPW Stage 2 EIS</p>

Issue	#	Summary	Comments	Reference
	6.A.18	The overall approvals process is inherently murky and deceptive to anyone who wants to review the proposal in its entirety as the goalposts of the project are regularly moving, making it difficult to trust and comprehend the proponent's intentions	The approvals process for this SRtS has been undertaken in accordance with Part 4, Division 4.1 of the <i>Environmental Planning and Assessment Act 1979</i> and to satisfy the provisions of Section 89G of the EP&A Act and Clause 85A(2) of the EP&A <i>Environmental Planning and Assessment Regulation 2000</i> . The documentation has been prepared to clearly identify any amendments to the MPW Concept Approval to make it more readable to both government stakeholders and the community.	Section 1.1 of this SRtS
	6.G.2	Confused by the presentation of the project and the application process, the staged release of applications, the changing of the configuration, infrastructure layout and design	The lodgement and exhibition timeframes for the MPW Concept Modification RtS is considered transparent and above standard requirements for public exhibition. An extended exhibition period of over 10 weeks (December 14 th 2016 to 24 th February 2017) was provided by DP&E to account for the Christmas period and concurrent exhibition of three separate proposals/modifications. The minimum exhibition period for such documentation is 30 days.	
	6.A.19	Proposal has too many pages and sections for individuals to effectively review	The approvals process for this SRtS has been undertaken in accordance with Part 4, Division 4.1 of the <i>Environmental Planning and Assessment Act 1979</i> and to satisfy the provisions of Section 89G of the EP&A Act and Clause 85A(2) of the EP&A <i>Environmental Planning and Assessment Regulation 2000</i> . Each assessment report to date is preceded by an executive summary section, designed to provide a succinct outline of key issues and progress of the subject Proposal to date. The approval process	Section 1.1 of this SRtS

Issue	#	Summary	Comments	Reference
			<p>relevant to this SRtS is outlined in Section 1 of this Report.</p> <p>Further, the length of the documentation prepared is reflective of the SEARs provided and the detail of technical assessments required.</p>	
	6.A.20	What applications further to this will be made which alters or sells-off the function, purpose and ownership of this site?	<p>Any further modification applications (if required) would be undertaken in accordance with the relevant planning provisions and legislative framework. As required under s96(1A) or (2) (as relevant) of the EP&A Act, any modification to the MPW Concept Approval (SSD 5066) would be required to demonstrate that any proposed changes would result in substantially the same development as the development for which the consent was originally granted. Under the provision of the EP&A Act, the overall function and purpose of the site cannot be modified in a manner that would result in a development that is not 'substantially the same' as the currently approved MPW Project (i.e. the MPW Concept Approval).</p> <p>Further, there is no change to current land ownership arrangements which is leased by the Commonwealth to SIMTA, and land ownership is outside of the scope of the Amended Modification Proposal.</p>	Section 1.1 of this SRtS
	6.B.4	This modification proposal now makes all previous studies and proposals irrelevant as the plans have changed, planning and testing should be done again and the	The MPW Concept Modification report has been prepared to build upon the assessments and findings of the previously approved MPW Concept Approval documentation, by presenting design changes that	Section 7.2 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
Environmental Management Documents		new data presented to the public for consultation	are generally consistent with the approved development. A detailed justification and assessment, including an assessment of the incremental changes against the previously approved impacts, has been provided for the Amended Modification Proposal as required under s96(2) of the EP&A Act (refer to Section 7 of the MPW Concept Modification RtS).	
	6.B.10	Development hasn't been fully assessed		
	6.B.8	Opposed to the change of function of the intermodal terminal to allow interstate, intrastate and port shuttle freight rail	A detailed description of the components of the Amended Modification Proposal is provided in Section 6 of the MPW Concept Modification RtS, and an environmental assessment and justification of each component as part of the Amended Modification Proposal is provided in Section 7 of the same report. Overall, the assessment identifies that the Amended Modification Proposal would, subject to the implementation of updated mitigation measures (refer to Section 8 of this MPW Concept Modification RtS), be generally consistent with the environmental impacts identified within the MPW Concept EIS/RtS/SRtS.	Section 6 and 7 of the MPW Concept Modification RtS
	6.C.1	The original EIS did not allow for the amount of fill required for retail, commercial or light industrial uses and therefore should be reassessed	The MPW Concept EIS, prepared by PB (2014) concluded that there was a cut to fill balance across the site. Section 8 of the MPW Concept EIS states "It is important to note that, should the Project be granted Stage 1 SSD approval, detailed engineering studies would be prepared to determine the optimal design for the Project". Progressive detailed design (i.e. "detailed engineering studies") has determined that the importation of fill is required for the functionality of the internal site drainage system and	MPW Concept EIS/RtS/SRtS MPW Concept Modification Report/RtS/SRtS N/A
	6.D.4	Concerned that recent investigations show that an amount of 1,600,000 cubic metres of clean fill are now required for the site. How was this overlooked initially? The reports contain a number of mistakes. Independent studies need to		

Issue	#	Summary	Comments	Reference
		be taken to find the true facts and figures.	<p>this is a function that is unrelated to the uses of the site as referenced in the submission.</p> <p>The Amended Modification Proposal proposes a development which is 'substantially the same' as that provided within the MPW Concept Approval in that it would facilitate the development of an intermodal terminal facility with the same IMT throughput limitations, warehousing GFA, freight village, truck parking and other ancillary development as provided within the MPW Concept Approval.</p>	
	6.C.2	Amendments introduce significant environmental impacts and should be addressed separately in their own EIS not included as an amendment	<p>The amendments introduced within the MPW Concept Modification RtS (refer to Section 6) are included as part of the Amended Modification Proposal as their inclusion would result in a development that is 'substantially the same' as that initially proposed and approved under the MPW Concept Approval (SSD 5066). This approach, to seek modification to the initial consent, is consistent with the provisions outlined within S96(2) of the EP&A Act for modification of consent.</p> <p>Overall, the assessment identifies that the Amended Modification Proposal would, subject to the implementation of updated mitigation measures (refer to Section 8 of the MPW Concept Modification RtS), result in environmental impacts that are generally consistent with those identified within the MPW Concept EIS/RtS/SRtS.</p>	MPW Concept EIS/RtS/SRtS MPW Concept Modification Report/RtS/SRtS
	6.C.5	PAC has raised a number of issues which SIMTA must comply with,	The Amended Modification Proposal would comply with all planning approval requirements, i.e. the MCoAs and REMMS issued for the MPW Concept Approval, and any additional mitigation measures	MPW Concept EIS/RtS/SRtS

Issue	#	Summary	Comments	Reference
		respondent doesn't believe that they intend to comply	identified in Section 6 of this RtS. Further, compliance with these would be enforced by the Appropriate Regulatory Authority.	MPW Concept Modification RtS
Tech Studies	6.D.1	Visual Impact Assessment and Light spill studies show that significant landscaping, screening and architectural elements will be needed in order to shield site operations	A Visual Impact Assessment (VIA), prepared by Clouston Associates, and a detailed light spill assessment, prepared by AECOM, were undertaken to inform the MPW Concept EIS. These assessments determined that the visual impacts would reduce with the implementation of mitigation measures including, landscaping, screening and urban design elements.	MPW Concept EIS (Technical Papers 12 and 13) Section 7 of the MPW Concept Modification RtS
	6.D.2	The impact of light spill to residential properties will affect residents 24/7. The light spill study show this.	A revised Visual Impact Assessment (VIA) was undertaken to assess additional operational visual and light spill impacts resulting from increased building heights as a result of the Amended Modification Proposal, from key sensitive receptors to the west of the MPW site. The assessment found visual or light spill impacts generated as a result of the Amended Modification Proposal would remain consistent with those initially presented in the MPW Concept Approval (refer to Section 7 of the MPW Concept Modification RtS). Existing identified mitigation measures and controls would remain applicable to the Amended Proposal (refer to Section 6 of this SRtS).	
	6.D.3	Thorough research needs to be done to substantiate the project to the local people	The strategic context and need for the MPW Project is outlined in detail in Section 3 of the MPW Concept EIS. This information has been provided to the public throughout the approval process via exhibition of the MPW Concept EIS, and other consultation mediums, as outlined in the consultation chapters of the EIS,	

Issue	#	Summary	Comments	Reference
			<p>RtS, SRtS and MPW Stage 2 EIS and as found on the SIMTA website (www.SIMTA.com.au).</p> <p>The MPW Concept Approval was determined in June 2016 (SSD 5066). The Amended Modification Proposal would not result in any changes to the approved concept that would alter the overall Project justification.</p>	<p>Section 2 of the MPW Concept SRtS</p> <p>Section 6 of the MPW Stage 2 EIS</p>
	6.E.3	Since project was conceived the surrounding areas have been rezoned to medium and high density, greatly increasing strain on traffic, resources etc.	Detailed impact assessments have been undertaken progressively for both the MPW Project, MPW Concept Modification (and Amended Modification) and also for Stage 2 of the MPW Project. In particular, these assessments have considered the zoning of the surrounding area at the time of the assessment and the impacts of the development's traffic in relation to growth in background traffic and the MPW Project. The extent of future development considerations for traffic growth is dependent on the LMARI Traffic Model, provided by Roads and Maritime Services. The information provided is therefore considered current and consistent with the level of detail required for each stage of development in accordance with the EP&A Act.	<p>MPW Concept EIS/RtS/SRtS</p> <p>MPW Concept Modification Report/RtS/SRtS</p> <p>MPW Stage 2 EIS/RtS</p>
	6.E.4	Proposed raising of vertical alignment of Moorebank avenue for 1.5kms by 2m from the northern boundary of MPE to 120 meters south of the MPE site will require more space for the proposed site	<p>The MPW Amended Modification Proposal does not seek approval for these works and this submission is therefore not considered relevant to this SRtS.</p> <p>The proposed Moorebank Avenue upgrades are included in the MPE Stage 2 EIS.</p>	MPE Stage 2 EIS
	6.E.6	If this goes ahead the Government and the Private Consortium involved will be held accountable in a court of law.	This submission is considered to be outside the scope of the modification application.	Section 1 of this SRtS

Issue	#	Summary	Comments	Reference
			The approvals process for this SRtS has been undertaken in accordance with Part 4, Division 4.1 of the <i>Environmental Planning and Assessment Act 1979</i> and to satisfy the provisions of Section 89G of the EP&A Act and Clause 85A(2) of the EP&A <i>Environmental Planning and Assessment Regulation 2000</i> .	
MPW Stage 2	6.F.1	SIMTA shouldn't be able to apply for Stage 2 when they haven't finished modifying their concept plan	The MPW Amended Modification Proposal seeks to modify the MPW Concept Approval to facilitate for future stages of development including, but not limited to, the Stage 2 of the MPW Project. It is intended that the Amended Modification Proposal would be determined prior to the determination of Stage 2 of the MPW Project. This approach is in accordance with the EP&A Act.	MPW Concept EIS/RtS/SRtS MPW Concept Modification Report/RtS/SRtS MPW Stage 2 EIS/RtS
	6.F.2	Stage 2 should not be approved when concept plan and layout is not finalised		
	6.F.6	Subdivision is an alarming term. Does this mean there is the potential further sale of subdivided plots for alternative uses which may not be bound by this application or time frame. Will subdivided plot be bound by the same regulation?	As outlined in Section 6.5.8 of the MPW Concept Modification RtS, the inclusion of subdivision within the Amended Modification Proposal is for the purpose of the MPW site to facilitate long-term leases for individual tenants using the site's approved facilities. Any of the lots created would be subject to the provisions of the MPW Concept Approval, this Amended Modification Proposal and any relevant stage approvals.	Section 6.5.8 of the MPW Concept Modification RtS
MPW Modification 1	6.G.1	The modification application ignores the extremely close position of historic Glenfield Farm to the spur line site, and	The tie-in of the Rail link to the SSFL, which crosses the Glenfield Waste Facility, is approved to be constructed and operated under the MPE Stage 1 Project (SSD14-6766). The Proposal would utilise this Rail link for operational purposes only. The MPW	Section 22 of the MPW Concept EIS

Issue	#	Summary	Comments	Reference
		the impacts of the modifications on the Glenfield Farm site.	<p>Concept Modification RtS assesses the additional impacts generated by the Amended Modification Proposal above those already assessed for the MPW Concept Approval (SSD 5066). Modification components potentially resulting in additional impacts to Glenfield Farm include potential visual and noise impacts only (through revised building heights).</p> <p>A Visual Impact Assessment (VIA), prepared by Clouston Associates, and a detailed light spill assessment, prepared by AECOM, were undertaken to inform the MPW Concept EIS. The viewpoints assessed included both the southern and northern sections of Leacock Regional Park, both located within close proximity to Glenfield Farm, looking across onto the Proposal site (viewpoints 1 and 2). The results of this assessment indicate that at full-build, the visual impacts would range from Moderate (viewpoint 1) to Moderate/high (viewpoint 2), with direct views to the site. Further impact assessment was undertaken for the MPW Concept Modification RtS, using the same viewpoints as those selected for the MPW Concept EIS to maintain consistency (refer to Section 7.1.10 of the MPW Concept Modification RtS). The results from this assessment indicate that operational visual impacts are predicted to range from moderate (viewpoint 1) to moderate/high (viewpoint 2) as a result of the Amended Modification Proposal (i.e. indicating no noticeable change from the MPW Concept Approval assessment). These visual impacts are to be further mitigated and are considered acceptable based on the distance of the</p>	<p>Section 7.1.10 of the MPW Concept Modification RtS.</p> <p>MPW Stage 2 EIS and MPW Stage 2 RtS</p>

Issue	#	Summary	Comments	Reference
			<p>site from surrounding receivers, vegetation to be retained and topography of the area.</p> <p>Other impacts that may be experienced at the Glenfield Farm site relevant to the MPW Project include operational noise. The Amended Modification Proposal does not alter the use or form of the Rail link as to be used in the MPW Concept Approval and constructed under the MPE Stage 1 Approval (SSD 16-6766). As a result, REMMs and CoA's included in the MPW Concept Approval are considered suitable to mitigate the impact of the Amended Modification Proposal.</p>	
	6.G.3	Confused by the terminology of intra-inter and port shuttled freight? Does this mean an extra westerly access connection from the direction of Glenfield? I cannot see the plan for this	<p>Interstate refers to freight that is being transported from/to outside NSW within Australia, while intrastate refers to freight being transported within and around NSW,. Port shuttled freight refers to freight that is received/delivered to/from Port Botany for import/export via the designated port shuttle locomotives.</p> <p>The Rail link to be constructed under the MPE Stage 1 Approval includes both a southern and northern connection to the SSFL. The design of this Rail link caters for both port shuttle and intra/interstate train movements. No additional connections of the Rail link to the SSFL are proposed above those identified within the MPE Stage 1 Approval and MPW Concept Approval.</p>	N/A

Issue	#	Summary	Comments	Reference
	6.G.4	Why is the Georges River Bridge not mentioned in the REMM.	<p>It is noted that the REMMs for the MPW Concept Approval do include reference to the Georges River bridge. As this bridge is not being constructed under this approval these REMMs are no longer relevant to the MPW Proposal.</p> <p>The proposed rail bridge across Georges River is to be constructed under the MPE Stage 1 (SSD 14-6766) Approval, in line with the final compilation of mitigation measures for the MPE Stage 1 Approval (refer Section 8 of the MPE Stage 1 RtS).</p>	Section 8 of the MPE Stage 1 RtS
	6.G.5	Why is there no duty of care to the Casula / Liverpool Links Estate?	The MPW Concept environmental approvals documentation (i.e. the EIS, RtS and SRtS) and the MPW Concept Modification Report/RtS/SRtS, have been prepared (and approved where applicable) in accordance with the relevant legislation. Additionally, the Amended Modification Proposal would be constructed and operated in accordance with the updated mitigation measures detailed in Section 6 of this SRtS.	<p>MPW Concept EIS/RtS/SRtS</p> <p>MPW Concept Modification Report/RtS/SRtS</p> <p>Section 6 of this SRtS</p>
	6.G.6	New applications are so different from the original that new application must be made	The amendments introduced within the MPW Concept Modification RtS (refer to Section 6) are included as part of the Amended Modification Proposal as their inclusion would result in a development that is “substantially the same” as that initially proposed and approved under the MPW Concept Approval (SSD 5066). This approach, to seek modification to the initial consent, is consistent with the provisions outlined within S96(2) of the EP&A Act for modification of consent.	Section 6 and 8 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
			Overall, the assessment identifies that the Amended Modification Proposal would, subject to the implementation of updated mitigation measures (refer to Section 8 of the MPW Concept Modification RtS), result in environmental impacts that are generally consistent with those identified within the MPW Concept EIS/RtS/SRtS.	
Economic Impacts				
General	7.A.1	SIMTA is importing fill for profit	As outlined within Section 6.5 of the MPW Concept Modification RtS, progressive detailed design undertaken subsequent to the exhibition of the MPW Concept SRtS has determined that clean general fill importation, as part of the Amended Modification Proposal, is required to support the functionality of the internal site drainage system in a range of storm events. On this basis, this activity is required to improve the environmental performance, specifically relating to stormwater management, of the Amended Modification Proposal.	Section 6.5 of the MPW Concept Modification RtS
	7.A.4	Objects to the use of public funds for this privately-owned project	The MPW Project is to be funded mostly by SIMTA, a private sector consortium, while a smaller portion would be contributed by MIC, which is an Australian government business. The MPW Project (and Amended Modification Proposal) would result in benefits to the wider community on a regional scale through a shift from road to rail and improved freight movements from Port Botany to Moorebank (refer to Section 1.4.1 of the MPW Concept EIS Technical Paper 1).	MPW Concept EIS Technical Paper 1
	7.D.3	Raising the ground works by 2m is a waste of tax payers money		
	7.D.4	Waste of tax payers funds		

Issue	#	Summary	Comments	Reference
	7.A.5	Will benefit multinational companies who will not pay their fair share of taxes	<p>The justification and strategic need of the MPW Concept Approval is outlined in Section 3 of the MPW Concept EIS.</p> <p>The MPW Project (and Amended Modification Proposal) would result in benefits to the wider community on a regional scale through a shift from road to rail and improved freight movements from Port Botany to Moorebank (refer to Section 1.4.1 of the MPW Concept EIS Technical Paper 1).</p> <p>The Amended Modification Proposal does not alter the overall merit of the MPW Project or the assessment undertaken for the MPW Concept Approval (refer to Section 6.5 of the MPW Concept Modification RtS).</p>	<p>Section 3 of the MPW Concept EIS</p> <p>Section 6.5 of the MPW Concept Modification RtS.</p>
	7.A.6	Imposing health and safety issues on a community for the benefits of business economics is unethical	<p>The strategic need and justification of the MPW Concept Approval is outlined in Section 3 of the MPW Concept EIS, and is considered outside the scope of the Amended Modification Proposal.</p> <p>Human health impacts associated with the Amended Modification Proposal are assessed in Section 7.1 of the MPW Concept Modification RtS. The assessment findings indicate that there would be a minor intensification of short-term air quality and noise impacts during the importation of clean general fill, when compared to the findings of the MPW Concept Approval assessment. However, the mitigation measures identified for the MPW Concept Approval for human health would be adequate in mitigating this impact, and have been included for implementation within Section 6 of this SRtS.</p>	<p>Section 3 of the MPW Concept EIS</p> <p>Section 7.1 of the MPW Concept Modification RtS</p> <p>Section 6 of this SRtS</p>

Issue	#	Summary	Comments	Reference
	7.A.7	Forwarding freight on from its original port destination in Port Botany will increase freight and shipping costs while unnecessarily clogging roads	<p>The strategic need and justification of the MPW Concept Approval is outlined in Section 3 of the MPW Concept EIS, and is considered outside the scope of the Amended Modification Proposal. It is however noted that the MPW Project, as outlined in the MPW Concept EIS (refer to Section 3), would in fact result in a reduction of road freight congestion between Port Botany and Moorebank as this freight would be transferred by rail (refer to Section 1.4.1 of the MPW Concept EIS Technical Paper 1).</p> <p>The Amended Modification Proposal does not alter the overall merit of the MPW Project, its regional benefits or its assessment (refer to Section 6.5 of the MPW Concept Modification RtS).</p>	<p>Section 1 and 3 of the MPW Concept EIS</p> <p>Section 6.5 of the Concept Modification RtS</p>
	7.A.8	Increased health problems from the proposals pollution will cause an increase in the cost of Medicare and hospitals due to the increase number of people with medical conditions	<p>A Health Impact Assessment (HIA) and Human Health Risk Assessment (HRA) were prepared by Environmental Risk Services (EnRisks, 2014) for the MPW Concept Approval. The assessment evaluated both direct and indirect impacts of all aspects of the Proposal on the health and wellbeing of the community, both regionally and locally (including sensitive receivers such as schools, residential areas and retirement homes) for a construction and operational scenario for a range of health endpoints. Overall, the HIA concluded that the potential health risks and impacts imposed by the MPW Project, including air emissions from vehicles, trucks and trains would be negligible during construction and low during operation, such that impacts would be managed through the implementation of mitigation</p>	<p>Section 7.1.12 and 8 of the MPW Concept Modification RtS</p>

Issue	#	Summary	Comments	Reference
			<p>and management measures prescribed in the MPW Concept EIS.</p> <p>Health related impacts generated by air and noise emissions from the Amended Modification Report have been assessed within Section 7.1.12 of the MPW Concept Modification RtS. These impacts are considered to be low risk and short-term in nature, in the presence of mitigation measures included within Section 6 of this SRtS. It is therefore anticipated that Medicare and hospital costs through increased morbidity rates as a direct or indirect result of the Amended Modification Proposal would be low.</p>	
Reduction in property prices and compensation	7.B.1	Project would cause a decrease in property and land value	Potential impacts to property values were considered in the Approved MPW Concept (Refer to Section 23 of the MPW Concept EIS). The Amended Modification Proposal does not alter the potential impacts of this approval with regards to surrounding property prices.	Section 23 of the MPW Concept EIS
	7.B.2	Impacts to nearby resident's economic wellbeing	Social and economic impacts were considered in the MPW Concept Approval (SSD 5066) (Refer to Section 24 of the MPW Concept EIS). The Amended Modification Proposal does not alter the impacts identified in this approval with regards to the socioeconomic status of nearby residents. A socio-economic impact assessment was undertaken and is included in Section 7.1 of the MPW Concept Modification RtS.	Section 24 of the MPW Concept EIS
	7.B.3	Request for reimbursement of property capital loss	The Amended Modification Proposal does not result in increased levels of impact compared to the	N/A

Issue	#	Summary	Comments	Reference
			approved MPW Concept Approval that would require compensation for property capital loss.	
	7.B.5	The intermodal project will drive new residents and investment away from the region	<p>Social and economic impacts were considered in the Approved MPW Concept (refer to Section 23 of the MPW Concept EIS). The Amended Modification Proposal does not alter the impacts of this approval with regards to surrounding residential growth.</p> <p>A socio-economic impact assessment of the Amended Modification Proposal was undertaken and is included in Section 7.1 of the MPW Concept Modification RtS. The results of this assessment indicate that the findings of the MPW Concept Approval (i.e. that the socio-economic impacts to the surrounding community would be a minor, temporary change in existing noise, air, traffic and visual amenity and negligible impacts to the local population or demand for community services) are consistent with the impacts associated with the Amended Modification Proposal.</p>	Section 23 of the MPW Concept EIS
Cost of the project	7.D.6	Government has not allocated suitable funds for the required infrastructure to establish the site	<p>The MPW Project is to be funded by both SIMTA – a private sector consortium, and MIC – an Australian government business. The MPW Project (and Amended Modification Proposal) would result in benefits to the wider community on a regional scale through a shift from road to rail and improved freight movements from Port Botany to Moorebank (refer to Section 1.4.1 of the MPW Concept EIS Technical Paper 1).</p> <p>The Amended Modification Proposal does not alter the overall merit of the MPW Project or the assessment undertaken for the MPW Concept</p>	MPW Concept EIS MPW Concept EIS Technical Paper 1

Issue	#	Summary	Comments	Reference
			Approval with respect to infrastructure to establish the site. Future road upgrades to support the MPW Project (and the Moorebank Precinct), and consider background traffic growth, are to be considered as part of future stages of approval.	
Community				
Consultation	8.A.1	Consultation to date has been insufficient/non existent	A summary of all consultation undertaken to date for the Amended Modification Proposal is included in Section 2 of this SRtS.	Section 2 of this SRtS
	8.A.9	SIMTA is not listening to the community and is treating it with contempt	<p>SIMTA (and MIC) has engaged in ongoing community consultation since 2010. This has included multiple newsletters distributed to approximately 10,000 households within the nearby suburbs, including those within a 1km radius of the MPW site.</p> <p>Consultation with the community specific to the MPW Concept Modification RtS was undertaken as part of the exhibition/public notification period as required under s96(2) of the EP&A Act.</p> <p>Consultation with key stakeholder groups, agencies and the public would be ongoing as part of the project (and the Amended Modification Proposal).</p>	
	8.A.2	Multistorey high-rise apartment buildings are being constructed within 1km of the proposed site, these new owners have not been consulted with and their views will be obstructed with the proposal	SIMTA (and MIC) has engaged in ongoing community consultation since 2010. This has included multiple newsletters distributed to approximately 10,000 households within the nearby suburbs, including those within a 1km radius of the MPW site. The community have also been given the opportunity to make a submission as part of the exhibition/public notification period as required under	<p>Section 27.2.3 of the MPW Concept EIS</p> <p>Section 7.1.10 of the MPW Concept Modification RtS</p>

Issue	#	Summary	Comments	Reference
			<p>s96(2) of the EP&A Act for the MPW Concept Approval and MPW Concept Modification Report/RtS.</p> <p>Overall, environmental impacts have been considered for all residential uses (and other land uses) within proximity to the MPW site (refer to Section 7 of the MPW Concept Modification RtS).</p>	
	8.A.3	Huge swathes of the broader community, who will also be affected, have been left out of the consultation process such as Bayside council area, Sutherland shire, Georges river, Canterbury, and Bankstown	<p>As discussed in Section 2 of this SRtS, consultation activities to inform and engage the community and other stakeholders began during 2010 as an ongoing process, and have been undertaken in accordance with obligations set out within the Secretary's Environmental Assessment Requirements (SEARs) (SSD 5066) and Revised Environmental Management Measures (REMMs) identified in the MPW Concept Approval (SSD 5506).</p> <p>Key consultation activities throughout this period have included:</p> <ul style="list-style-type: none"> • Establishment and ongoing updates to the MPW Project website (http://www.micl.com.au), providing information relating to the progress of the Project, details relating to the environmental assessment and consultation information • Establishment of a Project Information Line to enable all stakeholders to provide feedback and ask questions • Personal briefing sessions with residents who have contacted SIMTA through the Project website 	<p>Section 2 of this SRtS</p> <p>MPW Concept EIS Technical paper 1</p>

Issue	#	Summary	Comments	Reference
			<ul style="list-style-type: none"> Community update newsletters sent to residential households within suburbs adjacent to the MPW site (consultation area - including households in Casula, Wattle Grove, Holsworthy and Glenfield) Community information sessions to allow dissemination of information relating to the MPW Project, as well as to provide the community with the opportunity to ask questions, discuss any issues with members of the technical team and to take away fact sheets on some of the technical studies Stakeholder meetings were held with local community members to address particular concerns raised relating to the MPW Project. <p>Notwithstanding this, the MPW Project (and the Amended Modification Proposal) once operational would result in a mode shift from road to rail thereby reducing the number of vehicle movements travelled between Port Botany and Moorebank. The Proposal would provide regional benefits including contribution to a reduction in traffic congestion and air pollution in some of the listed Local Government Areas (LGAs) (refer to Section 1.4.1 of the MPW Concept EIS Technical Paper 1). In particular, the MPW Project (and Amended Modification Proposal) is likely to reduce traffic movements through the Bayside, Canterbury / Bankstown LGAs which are currently experiencing direct traffic impacts from road freight from Port Botany.</p>	

Issue	#	Summary	Comments	Reference
Impacts to community and lifestyle	8.B.1	The Proposal would impact on community, families and lifestyle. Impacting general health, traffic and environment through noise and pollution for years to come	Impacts to community health and lifestyle were identified and assessed in the MPW Concept Approval, through assessments for traffic, health, noise, and air (Refer to Sections 11, 12, 17 and 25 of the MPW Concept EIS).	Sections 11, 12, 17 and 25 of the MPW Concept EIS
	8.B.3	The proposal would impact young families who have settled in the area	The provision of mitigation and management measures for the MPW Concept Approval (Refer to Section 7 of the this SRtS) would adequately manage impacts to comply with relevant standards and guidelines issued by the appropriate regulatory bodies.	Section 7.1 of the MPW Concept Modification RtS
	8.B.4	The proposal would be detrimental to community connections and depreciate the area		Section 6 of this SRtS
	8.B.5	The Proposal will decrease the quality of life for the community	It should also be noted that Section 3 of this document outlines the strategic justification for the Project, indicating that the MPW Project would deliver a number of benefits to the community and economy. Such benefits include the generation of over 3000 jobs, economic benefits through improved productivity and reduced operating costs, and environmental benefits through reduced road congestion resulting in fewer truck journeys and associated greenhouse gas emissions reductions. The MPW Concept Modification RtS included an environmental assessment to measure the change in impacts associated with key aspects affecting health, traffic, noise and vibration and air of the Amended Modification Proposal in comparison to the MPW Concept Approval (refer to Section 7.1 of the MPW Concept Modification RtS). The findings from this assessment indicate that impacts to human health, traffic (including connectivity), noise and vibration and air quality	
	8.B.10	Extensive construction works and operation will impact the surrounding community in regards to noise, emissions, dust, braking, lighting and shunting		
	8.B.11	It is unrealistic to assume that this development in such a small community will have no impact		
	8.B.12	Facility will stifle growth in an important business growth centre		
	8.B.20	Proposal fails to truly consider impacts to local residents		

Issue	#	Summary	Comments	Reference
			associated with the Amended Modification Proposal would be short-term, and generally consistent with those identified for the MPW Concept Approval. Potential residual impacts of the Amended Modification Proposal would be managed through of the implementation of the REMMs (in the MPW Concept Approval), integrated into the revised mitigation measures of this SRtS (refer to Section 6 of this SRtS).	
	8.B.2	The proposal would change the character of the area	The EIS for the MPW Concept Approval included consideration of the choice of the current site and potential alternative sites. Submissions regarding site selection are therefore considered out of scope of the Amended Modification Proposal. A Planning Proposal (PP_2012_LPOOL_004_00) was prepared in conjunction to the MPW Concept Approval to rezone the MPW site from SP2 Infrastructure (Defence) to partly IN1 General Industrial and E3 Environmental Management. This change of land use, which facilitated for the MPW Project, was gazetted as an amendment to the Liverpool LEP 2008 on 24 June 2016. The change was consistent with the adjacent LEP zoning (IN1 for the MPE site to the east and broader industrial area) which had been in existence for a number of years. The MPW Concept Approval included a detailed assessment and associated mitigation measures to reduce the impact of the MPW Project on surrounding residential uses. Of key consideration is that the nearest residential area to the MPW site is located to	
	8.B.6	Industrial area not appropriate in the middle of a residential community		
	8.B.7	Densely populated family orientate residential area not suitable for such a development		
	8.B.8	The proposal will risk destroying the unique, young family orientated community, specifically one that is surrounded by the bush		
	8.B.9	The proposal is located too close to residential areas		
	8.B.13	Adverse impacts on the standard of living for local residents		

Issue	#	Summary	Comments	Reference
			<p>the west of the site (Casula suburb), which is buffered by the permanent conservation (riparian corridor) area and the Georges River. The MPW site is generally located in an industrial area and surrounding by similar uses along Moorebank Avenue (north) and on the northern side of the M5 Motorway.</p> <p>The location of the MPW Project (and the Amended Modification Proposal) is therefore considered suitable in the context of the surrounding uses, distance to residential properties and mitigation measures proposed to minimise impacts on the surrounding area (refer to Section 8 of the MPW RtS).</p>	
	8.B.14	Proposal will be of detriment to health and wellbeing of residents in surrounding suburbs	<p>A Health Impact Assessment (HIA) and Human Health Risk Assessment (HRA) were prepared by Environmental Risk Services (EnRisks, 2014) on for the MPW Concept Approval to evaluate health and wellbeing impacts associated with the MPW Concept Approval on the community, for a range of health endpoints appropriate to the range of pollutants expected. Overall, the HIA found that the potential health risks and impacts imposed by the MPW Concept Approval, would be negligible during construction and low during operation, such that impacts would be managed through the implementation of mitigation and management measures prescribed in the MPW Concept EIS.</p> <p>Ann assessment undertaken for the Amended Modification Proposal (refer to Section 7.1.12 of the MPW Concept Modification RtS) found that potential</p>	<p>Section 7 of the MPW Concept Modification RtS Report</p> <p>Section 6 of this SRtS</p>

Issue	#	Summary	Comments	Reference
			health impacts generated as part of the Amended Modification would be consistent with those identified in the MPW Concept Approval, and manageable through implementation of mitigation measures set out in Section 6 of this SRtS.	
	8.B.15	Raising site 2m will put the terminal in full view of surrounding residents making their life unbearable	<p>A Visual Impact Assessment (VIA), prepared by Clouston Associates, and a detailed light spill assessment, prepared by AECOM, were undertaken as part of the MPW Concept EIS. The findings of this assessment indicate that the greatest visual impact of the full build development would be on public park and residential receptors on the elevated areas to the west of the Georges River and residential properties backing onto the SSFL. For some residential locations that overlook the MPW Project site, these receptors would also experience a noticeable change in the brightness of the area on clear nights. The warehousing development would front Moorebank Avenue and would dominate views towards the MPW site from the east, which is predominately industrial. The visual impacts would reduce as landscaping is established.</p> <p>A revised VIA was undertaken to assess additional operational visual and light spill impacts resulting from increased building heights as a result of the Amended Modification Proposal, from key sensitive receptors to the west of the MPW site. The assessment found no considerable changes to visual or light spill impacts would be generated as a result of the Amended Modification Proposal when compared to those initially presented in the MPW Concept</p>	<p>MPW Concept EIS (Technical Papers 12 and 13)</p> <p>Section 7 of the MPW Concept Modification RtS</p>

Issue	#	Summary	Comments	Reference
			Approval (refer to Section 7 of the MPW Concept Modification RtS).	
	8.B.16	Diesel particle pollution and traffic will have a negative impact on residents and has not been looked at properly	<p>A Health Impact Assessment (HIA) and Human Health Risk Assessment (HRA) were prepared by Environmental Risk Services (EnRisks, 2014) for the MPW Concept Approval. Overall, the HIA found that the potential health risks and impacts of the MPW Project, including air emissions from vehicles, trucks and trains would be negligible during construction and low during operation.</p> <p>An assessment of air quality impacts associated with the Amended Modification Proposal is provided in Section 7.1 of the MPW Concept Modification RtS. The findings conclude that the impacts of the Amended Modification Proposal would be consistent with those identified for the MPW Concept Approval, taking with the implementation of mitigation and management measures identified in this SRtS.</p>	MPW Concept EIS Section 7 of the MPW Concept Modification RtS
	8.B.18	Many residents have illnesses and the current peaceful and green environment minimise symptoms and aid recovery	<p>As part of the MPW Concept Approval, a landscape plan and strategy was prepared, based on the visual and light spill assessments, to minimise visual impacts and to retain the environmental character of the area (refer to Section 22 of the MPW Concept EIS). This outcome is assisted by the retention of a large section of native vegetation located adjacent to the Georges River, which is commonly referred to as the conservation area. This conservation area would provide a visual buffer to many sensitive residential receivers to the west of the MPW site.</p> <p>Further, the Amended Modification would be unlikely to exacerbate existing illnesses. A Health Impact</p>	Section 22 of the MPW Concept EIS. Section 7 of the MPW Concept SRtS Section 6 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
			<p>Assessment (HIA) and Human Health Risk Assessment (HRA) were prepared by Environmental Risk Services (EnRisks, 2014) for the MPW Concept Approval. Overall, the HIA found that the potential health risks and impacts of the MPW Project, including air emissions from vehicles, trucks and trains would be negligible during construction and low during operation.</p> <p>An assessment of air quality and human health impacts associated with the Amended Modification Proposal is provided in Section 7.1 of the MPW Concept Modification RtS. The findings conclude that the impacts of the Amended Modification Proposal would be consistent with those identified for the MPW Concept Approval, taking into consideration the implementation of mitigation and management measures identified in Section 6 of this SRtS.</p>	
	8.B.19	Project will expose surrounding community to known carcinogens	<p>A Health Impact Assessment (HIA) and Human Health Risk Assessment (HRA) were prepared by Environmental Risk Services (EnRisks, 2014) for the MPW Concept Approval. Overall, the HIA found that the potential health risks and impacts imposed by the MPW Project would be negligible during construction and low during operation, taking into consideration the implementation of mitigation and management measures identified in the this SRtS.</p> <p>An assessment of health impacts, including the risk of cancer increase through the release of air toxics, generated by the Amended Modification Proposal, was undertaken (refer to Section 7 of the MPW Concept Modification RtS). Results indicate that</p>	<p>Section 27 of the MPW Concept EIS</p> <p>Section 6 of the MPW Concept Modification RtS</p>

Issue	#	Summary	Comments	Reference
			increases to the risk of all health end points assessed (considered appropriate and standard practice for the range of activities proposed) as part of the Amended Modification Proposal, would be below the acceptable risk level and within acceptable criteria.	
	8.B.21	Objects to extended working hours close to residents	As discussed in Section 3.2.6 of the MPW Modification Report and Section 8 of the MPW Stage 2 EIS, extended working hours have been nominated for materials delivery, stockpiling and placement of imported clean general fill material.	Section 8 of the MPW Stage 2 EIS
	8.B.22	Hours of operation (0600-2200 mon-fri and 0700-1800 weekends) is intrusive and will negatively affect families and residents.	<p>This has been proposed to distribute the traffic congestion associated with delivery of imported material outside of peak traffic times, for low-impact noise activities. An assessment of noise and vibration impacts of the Amended Proposal has been undertaken in Section 7.1.2 of the MPW Concept Modification RtS. This section concludes that the Amended Modification Proposal would not result in any noise exceedance (LAeq, 15min) at any of the sensitive receivers, for works proposed to be undertaken during the extended working hours nominated.</p> <p>Notwithstanding this, the REMMs and CoA's for the MPW Concept Approval, would be implemented for the works undertaken within extended working hours to further manage the noise impacts of the Amended Modification Proposal (refer to Section 6 of this SRtS).</p>	<p>Section 3.2.6 of the MPW Concept Modification Report</p> <p>Section 7 of the MPW Concept Modification RtS</p> <p>Section 6 of this SRtS</p>
Social	8.C.1	It's morally wrong to do this to residents in the area	The merits of this land use at this location were assessed as part of the MPW Concept Approval. The	MPW Concept Approval

Issue	#	Summary	Comments	Reference
	8.C.2	This project was approved years ago and the changing demographic and the approval of so many homes in the location makes the project untenable	Amended Modification Proposal does not seek to alter the MPW Project and MPW Concept Approval. Section 28 of the MPW Concept EIS includes a range of mitigation measures to manage and minimise impacts to surrounding land uses. Additional mitigation measures to manage impacts associated with the MPW Concept Modification have been included within section 5 of the MPW Concept Modification Report.	Section 28 of the MPW Concept EIS Section 5 of the MPW Concept Modification Report
	8.C.3	Proposal is too close to homes and schools		
	8.C.4	Objects to the impacts of the Proposal on quality of life such as the amenity of open spaces and travel times.	<p>The impacts generated by the MPW Project on the amenity of open spaces were assessed within the socio-economic and visual impact assessments, found in Sections 24 and 22 of the MPW Concept EIS, respectively. The findings of these assessments conclude that, although the MPW Project construction would be visible from a number of vantage points, including nearby parks, the overall impact on quality of life would be indirect, short-term and minor in nature.</p> <p>The impacts of the MPW Project on traffic and travel times were assessed in Section 11 of the MPW Concept EIS. The results of this assessment indicate that overall, only a minor contribution to congestion is predicted throughout the road network due to the traffic generated by the MPW Project.</p> <p>The environmental assessment included in the MPW Concept Modification RtS is provided to assess the change in impacts of the Amended Modification Proposal in relation to the MPW Concept Approval (refer to Section 7.1 of the MPW Concept Modification RtS).</p>	<p>Sections 22 and 24 of the MPW Concept EIS</p> <p>Section 7.1 of the MPW Concept Modification RtS</p> <p>Section 6 of this SRtS</p>

Issue	#	Summary	Comments	Reference
			<p>The findings of this assessment indicate that the impacts of the Amended Modification Proposal associated with amenity linked to open space impact and travel times would be consistent with those identified for the MPW Concept Approval. These would be able to adequately managed through implementation of the REMMs (in the MPW Concept Approval) and revised mitigation measures provided within Section 6 of this SRtS.</p>	
Safety	8.E.1	Erecting noise barriers in close proximity to noise sources is unsafe and impractical, especially when sources are not static	<p>Noise barriers were included as a mitigation measure within the MPW Concept EIS to provide noise attenuation in accordance with the assessment undertaken (refer to Section 12 of the MPW Concept EIS). It is intended to locate a noise barrier as close as possible to the noise source as the further away the noise wall is from the source, the less effective the structure becomes. Placing noise barriers in close proximity to noise sources is common practice and not considered to be unsafe.</p> <p>The exact location and design of noise walls (which would be designed subject to relevant engineering specifications) would be detailed during future development stages (in particular, Stage 2 of the MPW Project).</p>	<p>Section 12 of the MPW Concept EIS</p> <p>Section 6 of the MPW Stage 2 EIS</p>
	8.E.2	Traffic caused by the proposal will be dangerous and compromise the safety of residents	As outlined within Section 7.1.1 of the MPW Concept Modification RtS, the MPW Concept Approval included an assessment of existing traffic safety of Moorebank Avenue and sections of the M5 Motorway	Section 7 of the MPW Concept SRtS
	8.E.3	Concerned that SIMTA's official report states at this point that there is a 20 fold higher crash rate than the RMS threshold	(in accordance with the Roads and Maritime Accident Reduction Guide Version 1.1 [Roads and Maritime, 2005]).	Section 7.1.1 of the MPW Concept Modification RtS

Issue	#	Summary	Comments	Reference
		<p>for blackspots on Moorebank and Cambridge avenue, 2 fatalities over 5 years and MICL's EIS which states a 40 fold higher crash rate than the RMS threshold on the M5 between Heathcoat Road and the Hume highway, while the report states that between 75-85% of intermodal trucks will use these blackspots and 100% will use Moorebank Avenue. With 25% using Sydney's worst blackspot. Therefore, they are concerned this will result in more deaths</p>	<p>As per the Amended Modification Proposal, an impact assessment to identify and manage road safety impacts is outlined in Section 7.1.1 of the MPW Concept Modification RtS. This assessment concludes that the impacts would be generally consistent with those identified in the MPW Concept Approval, with mitigation measures identified for the MPW Concept Approval retained (refer to Section 6 of this SRtS).</p> <p>Indicative haulage routes and road access restrictions for the Amended Modification Proposal are discussed in Section 6.5.1 of MPW Stage 2 Revised CTIA, Appendix C of the MPW Stage 2 RtS. These haulage routes have been chosen so that sensitive local residential roads are protected from amenity impacts associated with heavy vehicle movements and arterial roads are used.</p> <p>A black spot assessment was not conducted as it is not a requirement of SEARs or REMMs for the Project. However, Arcadis assessed the crash trends on a network level which included the M5 Motorway (and its three interchanges with Moorebank Avenue, Hume Highway and Heathcote Road), Moorebank Avenue (north and south of M5 Motorway), Anzac Road, Cambridge Avenue, Moorebank Avenue/Newbridge Road intersection, and Moorebank Avenue/Heathcote Road intersection. Notwithstanding, the criteria for a blackspot is 3 casualty crashes over the most recent 5-year period. The high-level assessment conducted in the Operational Traffic and Transport Impact Assessment (for Stage 2 of the MPW Project) does not trigger this</p>	

Issue	#	Summary	Comments	Reference
			criterion i.e. 2 fatalities over a 5-year period from 2010 to 2015 and at two separate different locations. It is therefore considered beyond scope of this assessment.	
	8.E.4	Pollution and operation of the site will cause sleep deprivation which will cause increased instances of health issues	<p>An assessment of the noise and vibration impacts of the Amended Modification Proposal is included in Section 7 of the MPW Concept Modification RtS. The assessment identified that the predicted noise levels at sensitive receivers are less than, and therefore comply with, sleep disturbance screening levels at all sensitive receiver locations.</p> <p>As such, the Amended Modification Proposal is not anticipated to result in health impacts to local residents associated with sleep deprivation.</p>	Section 7.1 of the MPW Concept Modification RtS
Flora and Fauna				
General	10.A.2	Project would impact on native flora and fauna and destroy habitat for local species	<p>The biodiversity impacts of the MPW Concept Approval were assessed by Parsons Brinckerhoff (PB) in an Ecological Impact Assessment (PB 2014) for the MPW Concept EIS and a separate assessment under the Framework for Biodiversity Assessment (FBA) prepared as part of the MPW Concept RtS (PB 2015).</p> <p>Impact significance assessments were undertaken for threatened species, populations and threatened ecological communities and their habitats. The results of these assessments concluded that no threatened species, populations or threatened ecological communities listed under either the Commonwealth EPBC Act or the NSW TSC Act was considered likely to be significantly impacted as part of the</p>	<p>MPW Concept EIS</p> <p>Section 7.1 of the MPW Concept Modification RtS</p> <p>MPW Stage 2 Amended BAR</p> <p>Section 6 of this SRtS</p>
	10.A.4	Concerned project would impact threatened species including 45 trees with nesting hollows		

Issue	#	Summary	Comments	Reference
			<p>development. In addition, a variety of mitigation measures are proposed to reduce and offset impacts (refer to Section 6 of this SRtS). This includes the retention and enhancement of substantial areas of vegetation along the Georges River riparian corridor (including a permanent conservation area within the MPW site), and the preparation and implementation of an offset strategy to mitigate unavoidable residual impacts.</p> <p>Section 7.1 of the MPW Concept Modification RtS outlines and assesses any additional impacts to flora and fauna values as a result of the design changes proposed as part of the Amended Modification Proposal. Minor alterations to the construction footprint required additional land to be assessed for biodiversity impact. This assessment, included in the MPW Concept Modification RtS, concluded that no additional impacts to threatened ecological communities (within or near the site) would occur as a result of this change.</p> <p>Additional field assessment was undertaken for the MPW Stage 2 Proposal in February and March 2017. These surveys are documented in section 4.1 of this SRtS. Additional impacts to threatened species identified in the 2017 surveys are addressed in the MPW Stage 2 Amended Biodiversity Assessment Report (BAR), prepared for the MPW Stage 2 RtS. The area of threatened species habitat to be cleared has not changed since the MPW Concept Approval, and the Amended Modification Proposal would not result in additional impacts to threatened species or their habitat.</p>	

Issue	#	Summary	Comments	Reference
			In summary, the MPW Concept Approval includes MCoAs and REMMs which remain relevant and would be implemented as part of the Amended Modification Proposal as applicable to the relevant future stages of development. A full list of these REMMs is provided in Section 6 of this SRtS. No additional mitigation measures are required for the construction or operation of the Amended Modification Proposal with regards to biodiversity.	
	10.A.3	Project would impact endangered flora and fauna thought to be extinct, specifically <i>Hibbertia Fumana</i>	Additional field surveys were undertaken for the MPW Stage 2 Proposal on 9 and 14 February 2017 and 14 March 2017. These targeted surveys were conducted following the discovery of <i>Hibbertia puberula</i> subsp. <i>puberula</i> (listed as Endangered under the TSC Act) and <i>Hibbertia fumana</i> (provisionally listed as Critically Endangered under the TSC Act) on the Boot land east of Moorebank Avenue. These surveys are documented in section 4.1 of this SRtS and Section 4.2 of the MPW Stage 2 Amended BAR prepared for the MPW Stage 2 RtS.	Section 3 of this SRtS.
	10.C.6	Project will impact <i>Hibbertia Fumana</i> previously thought to be extinct, no impact study has been performed to determine effects on the plants habitat		Section 4.2 of Appendix G of the MPW Stage 2 RtS
	10.A.5	Concerned for impacts to rare, endangered and previously thought extinct species	The 2017 targeted surveys on the MPW site identified a population of <i>Hibbertia puberula</i> subsp. <i>puberula</i> in the east of the MPW site, and updated counts of the previously recorded threatened flora species <i>Grevillea parviflora</i> subsp. <i>parviflora</i> . All records of threatened flora species were within mapped areas of Hard-leaved Scribbly Gum - Parramatta Red Gum heathy woodland in the central eastern parts of the MPW site. Additional impacts to threatened species and ecological communities identified in the 2017 surveys	

Issue	#	Summary	Comments	Reference
			are addressed in Section 4.1 of this SRtS and Section 4.2 the MPW Stage 2 Amended BAR. The area of threatened species habitat to be cleared has not changed since the MPW Concept Approval, and the Amended Modification Proposal will not result in additional impacts to threatened species or their habitat.	
	10.A.6	Concerned project is reducing vegetation in the riparian corridor, how is this going to be offset	<p>The Amended Modification Proposal site, as outlined in Figure 4-1 of the MPW Concept Modification RtS, would result in the retention of a conservation area consistent with that identified within the MPW Concept Approval (refer to Figure 4-2 of the MPW Concept Modification RtS. Design refinements resulting in the inclusion of drainage channels within the riparian corridor are assessed as part of Stage 2 of the MPW Project and is considered out of scope of the Amended Modification Proposal.</p> <p>Overall, the impacts of the MPW Project on vegetation in the riparian corridor, will be offset in accordance with the requirements of the NSW Biodiversity Offsets Policy for Major Projects. Retained areas of riparian vegetation along the Georges River will be conserved under a Biobanking agreement, and will form part of the proposed offsets for the MPW Project.</p>	MPW Concept EIS/RtS/SRtS
	10.A.8	This modification shows that key information was withheld until after the approvals process relating to previous thought extinct species	Detailed surveys and biodiversity impact assessments have been undertaken progressively for the MPW Project, the MPW Concept Modification Proposal (and Amended Modification Proposal) and Stage 2 of the MPW Project. As outlined in Section 7.1.3, impacts to biodiversity associated with the	<p>MPW Concept EIS/RtS/SRtS</p> <p>MPW Concept Modification Report/RtS/SRtS</p>

Issue	#	Summary	Comments	Reference
			<p>Amended Modification Proposal are generally consistent to those identified for the MPW Concept Approval.</p> <p>Targeted surveys for threatened plant species on the MPW site conducted in 2017 (refer to Section 4.2 of the Revised BAR, Appendix G of the MPW Stage 2 RtS) did not record the previously thought extinct plant species <i>Hibbertia fumana</i>, now provisionally listed as critically endangered, and potential habitat for this species does not appear to be present on the MPW site.</p> <p>The approach undertaken for the Amended Modification Proposal has been transparent and consistent with the level of detail required for each stage of development, in accordance with the EP&A Act.</p>	MPW Stage 2 EIS/RtS
	10.A.11	Did SIMTA know in advance that there were previously thought extinct plant species on site and try to cover it up? Have they already damaged the plants?	<p>Detailed surveys and biodiversity impact assessments have been undertaken progressively for both the MPW Project, the MPW Concept Modification Proposal (and Amended Modification Proposal) and also Stage 2 of the MPW Project. The information provided is consistent with the level of detail required for each stage of development in accordance with the EP&A Act.</p> <p>Targeted surveys for threatened plant species on the MPW site conducted in 2017 (refer to Section 4.2 of the Revised BAR, Appendix G of the MPW Stage 2 RtS) did not record the previously thought extinct plant species <i>Hibbertia fumana</i>, now provisionally listed as critically endangered, and potential habitat</p>	<p>MPW Concept EIS/RtS/SRtS</p> <p>MPW Concept Modification Report/RtS/SRtS</p> <p>MPW Stage 2 EIS/RtS</p>

Issue	#	Summary	Comments	Reference
			for this species does not appear to be present on the MPW site.	
Vegetation management	10.B.2	What is the conservation and management plan for <i>Hibbertia fumana</i> ? which department will be delegated authority to ensure the plan is produced by the applicant?	<i>Hibbertia fumana</i> was not recorded on the MPW Site and will not be impacted by the Amended Modification Proposal. This species will be conserved on the Wattle Grove offset site, which will be subject to a Biobanking Agreement and managed in accordance with the Biobanking management plan to be approved by OEH and a Threatened Flora Offset Management Plan to be approved by the Commonwealth Department of the Environment and Energy.	MPW Concept EIS/RtS/SRtS
Impacts to native species	10.C.3	Impacts from removal of 45 hollow bearing trees	As outlined above in response 10.A.2, It is not expected that impacts to biodiversity during construction of the MPW Project (including the Amended Modification Proposal) would change from those previously considered in the MPW Concept EIS/RtS/SRtS including impacts relating to hollow bearing trees. Impacts to hollow bearing trees would be managed through the MPW Concept Approval MCoAs (reference Schedule 3 D18), REMMs and any other relevant MCoAs for the Amended Modification Proposal.	MPW Concept EIS/RtS/SRtS MPW Concept Modification Report/RtS/SRtS
	10.C.5	Non-reporting of extinct flora until 4 days after the report points to dishonesty and shows no community consultation	Detailed surveys and biodiversity impact assessments have been undertaken and documented progressively for both the MPW Project, the MPW Concept Modification Proposal (and Amended Modification Proposal) and also Stage 2 of the MPW Project.	MPW Concept EIS/RtS/SRtS MPW Concept Modification Report/RtS/SRtS MPW Stage 2 EIS/RtS

Issue	#	Summary	Comments	Reference
			Where new information relevant to MPW Project biodiversity impacts has been identified, this has been appropriately and accurately reported as early as possible and included, as relevant, in the planning approval documentation. Targeted threatened flora surveys of the MPW Site did not record <i>Hibbertia fumana</i> , and this species will not be impacted by the Amended Modification Proposal.	
	10.C.6	Project will impact Hibbertia Fumana previously thought to be extinct, no impact study has been performed to determine effects on the plants habitat	<p>Additional field surveys were undertaken for the MPW Stage 2 Proposal on 9 and 14 February 2017 and 14 March 2017. These targeted surveys were conducted following the discovery of <i>Hibbertia puberula</i> subsp. <i>puberula</i> (listed as Endangered under the TSC Act) and <i>Hibbertia fumana</i> (provisionally listed as Critically Endangered under the TSC Act) on the Boot land east of Moorebank Avenue. These surveys are documented in section 4.1 of this SRtS and Section 4.2 of the MPW Stage 2 Amended BAR prepared for the MPW Stage 2 RtS.</p> <p>The 2017 targeted surveys on the MPW site identified a population of <i>Hibbertia puberula</i> subsp. <i>puberula</i> in the east of the MPW site, and updated counts of the previously recorded threatened flora species <i>Grevillea parviflora</i> subsp. <i>parviflora</i>. All records of threatened flora species were within mapped areas of Hard-leaved Scribbly Gum - Parramatta Red Gum heathy woodland in the central eastern parts of the MPW site.</p> <p>Additional impacts to threatened species and ecological communities identified in the 2017 surveys are addressed in Section 4.1 of this SRtS and</p>	Section 3 of this SRtS.

Issue	#	Summary	Comments	Reference
			Section 4.2 the MPW Stage 2 Amended BAR. The area of threatened species habitat to be cleared has not changed since the MPW Concept Approval, and the Amended Modification Proposal will not result in additional impacts to threatened species or their habitat.	

6 REVISED ENVIROMENTAL MITIGATION MEASURES

The MPW Concept Approval identified a range of environmental impacts and recommended management and mitigation measures to avoid, remedy or mitigate these impacts, which were compiled in Chapter 7 of the Supplementary Response to Submissions Report (PB, 2015). Additional mitigation measures were also identified in the MPW Concept Modification Report and MPW Concept Modification RtS.

These mitigation measures have been revised, and additional mitigation measure have been proposed, in response to the submissions received during the public exhibition of the MPW Concept Modification RtS which described the Amended Modification Proposal. The final revised environmental mitigation measures (REMMs) for the MPW Concept Approval are below. For ease of reference, words proposed to be deleted are shown in ~~**bold italic strike through**~~ and words to be inserted are shown in **underlined bold italics**.

The proposed amendments to the MPW Concept Approval Conditions of Approval (CoA) (SSD 5066) are included in Section 6.3 of the MPW Concept Modification RtS. No further amendments to the MPW Concept Approval CoA (SSD 5066) are proposed as part of this SRtS.

The 'implementation stage' column of Table 8-1 details the timing as to when the specific mitigation measures will be implemented. For example, a CEMP might be prepared prior to construction, but will not be 'implemented' until the construction phase.

Table 6-1 Revised consolidated list of mitigation measures

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
/General environmental management						
Proposed environmental framework						
1A	An EMS that complies with AS/NZS ISO 140001:2004 would be developed and implemented on the Project site.	M	Detailed design, early works, construction and operation	Y	Y	Y
1B	EMPs including CEMPs and OEMPs (or equivalent) would be prepared for the Project. At this point, Provisional EMPs (included in Volume 2, Appendix H of the EIS) have been prepared and would be updated as more is known about the Project phasing including detailed design, construction and operation.	M	Detailed design and/or Early Works, construction, operation where relevant	Y	Y	Y
Consultation						
2A	<p>A Community Engagement Plan (CEP) (or equivalent) would be prepared to outline community involvement and consultation activities during early works, construction and operation phases.</p> <p>As a minimum, the CEP would include appropriate measures for community involvement, including:</p> <ul style="list-style-type: none">• a direct telephone number (24 hour);• an email address;• a postal address;• regular project updates;• a community liaison representative; and scheduled meetings with a local representative body such as a community consultative (or liaison) committee. <p>The CEP would also set out a guide on expectations for responding to relevant information received from community members.</p>	M	Early Works, construction and operation	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
2B	<p>The CEP would be prepared to achieve the following outcomes:</p> <ul style="list-style-type: none"> the community and stakeholders have a high level of awareness of all processes and activities associated with the Project; accurate and accessible information is made available; and a timely response is given to issues and concerns raised by stakeholders and the community. 	M	Construction and operation of each stage of development	Y	Y	Y
Sustainability						
3A	The final design would (as a minimum) provide for sustainability outcomes generally in accordance with the sustainability initiatives identified in Table 9.4 in Section 9 – Project sustainability of the MPW Concept Approval EIS.	SR	Detailed design	Y	Y	Y
3B	Implementation of sustainability initiatives would be monitored in accordance with the monitoring framework developed as part of the EMS for the next stage of approvals. This framework would identify sustainability indicators for monitoring.	M	Detailed design, construction and operation of each stage of development	Y	Y	Y
Traffic, transport and Access						
4A	The Project team would continue to liaise with the Australian Rail Track Corporation, Transport for NSW and other stakeholders responsible for the management of the rail freight network regarding the capacity of the network related to the project.	M	Detailed design and future development applications	Y	Y	N
4B	As part of the Stage 2 SSD approval(s) process further analysis would be undertaken to determine likely demand distribution and capacity across the rail freight network as it relates to the project.	M	Detailed design and future development applications	Y	Y	N
4C	Install a variable message signage system within the Project site to direct heavy vehicles and facilitate safe and efficient access and navigation.	SR	Detailed design, construction and operation of each	Y	N	N

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
			stage of development			
4D	Consider the provision of pedestrian and cyclist connections from Moorebank Avenue into the Project site.	SR	Detailed design, construction and operation of each stage of development	Y	N	Y
4E	Consider the provision of staff storage and shower areas to promote cycling, jogging and walking as modes of transport.	SR	Detailed design, operation of each stage of development	Y	N	Y
4F	Negotiate with bus operators for the provision of additional bus stops and increased bus services between the Project site and nearby public transport interchange hubs to reduce the volume of light vehicles generated by staff. This would be determined based on staff numbers and likely patronage numbers.	SR	Detailed design	N	N	Y
4G	Undertake detailed design and staging of the Project rail link construction works to achieve the following: <ul style="list-style-type: none"> connection with the Southern Sydney Freight Line (SSFL) is designed to minimise construction impacts on SSFL operations; connection with the SSFL would allow trains to exit and enter the SSFL main line at a maximum design speed of 45 kilometres per hour (km/h); trains entering and leaving the Project site endeavour to minimise adverse disruption to other operations on the SSFL; and the Project's internal train control system and signalling integrates with the SSFL system where required. 	SR	Detailed design and construction of each stage of development	Y	Y	N
4H	Prior to all future development application stages, in consultation with Transport for NSW and other relevant agencies of NSW Government, ensure that adequate arrangements are in place to achieve the following:	M	Detailed design and future development applications	N	N	N

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> The impacts of additional traffic associated with the future development application stages will minimise Project related traffic impacts and consider the capacity of the road network, taking account of background traffic growth and planned road network improvements. Arrangements are in place (irrespective of funding source) for the on-time delivery of the necessary road network improvements referred to in point 1 above. The contribution of MIC towards road network improvements as envisaged by this mitigation measure would be subject to the following conditions: That certain throughput levels at the terminal had been achieved. These throughputs are outlined in column 1 of Table 7.20 of the Response to Submissions report. 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 7.20 of the Response to Submissions report. 					
4Hi	<u>Road Safety Audit and dilapidation report is to be undertaken on Moorebank Avenue from Amended Modification Proposal site entrances to the M5 Interchange.</u>	<u>M</u>	<u>Early Works (Stage 1)</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
Traffic Management Plans						
4I	Reducing the volumes of construction vehicles travelling during peak periods, especially if the increase in traffic generated by construction activities impedes on the operation of Moorebank Avenue.	SR	Construction of each stage of development	Y	N	N
4J	Maintain access to neighbouring properties. It is particularly important that the ABB site has access throughout the construction stages.	M	Construction of each stage of development	Y	N	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
4K	In addition to the Community Engagement Plan (or equivalent) (Refer to 2A), a communication plan will be developed to provide information to the relevant authorities and bus operators in addition to the local community. The communication plan will need to incorporate a contact list with the chain of command.	M	Construction and operation of each stage of development	Y	Y	Y
4L	Implement relevant traffic control measures to inform drivers of the construction activities and locations of heavy vehicle access locations.	M	Construction of each stage of development	Y	Y	Y
4M	Obtain Road Occupancy Licences (ROLs) as necessary.	M	Construction of each stage of development	Y	Y	N
4N	Develop an emergency response plan for the modification of Moorebank Avenue. During this phase, emergency vehicles using Moorebank Avenue as a transport route would need to be considered, as well as emergency access to adjoining properties.	M	Construction of the modification to Moorebank Avenue	Y	N	N
4O	Traffic on Moorebank Avenue would be monitored during peak periods to ensure that queuing at intersections does not impact on other road users.	M	Construction of the modification to Moorebank Avenue	Y	N	N
4P	Modify access locations in response to the development of the Moorebank Avenue modification.	M	Construction of modification to Moorebank Avenue	Y	N	N
4Q	Provision of alternate suitable pedestrian and cycle and facilities during the construction of Moorebank Avenue modifications retaining well defined and well signed routes and paths.	SR	Construction of modification to Moorebank Avenue	Y	N	N
Construction Noise and Vibration						
5A	A construction noise and vibration management plan (CNVMP) (or equivalent) would be developed for construction activities.	M	Construction of each of stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
5B	The appropriateness of the noise and vibration management and mitigation measures in 5C to 5T are to be further investigated as part of the future development applications. These measures, or their replacement measures, are to be implemented through the CNVMP (or equivalent) prior to and during all noise-generating construction works for each of the Project phases.	M	Future development applications and construction of each stage of development	Y	Y	Y
5C	Construction activities associated with the Development shall be undertaken during the following standard construction hours: 7.00 am to 6.00 pm Mondays to Fridays, inclusive; and 8.00 am to 1.00 pm Saturdays at no time on Sundays or public holidays. <u>Works may be undertaken outside of standard construction hours, subject to assessment within, and approval of, future development applications</u>	SR	Construction of each stage of development	Y	Y	Y
5D	Construction works outside of the standard construction hours identified in REMM 5C may be undertaken in the following circumstances: <ul style="list-style-type: none"> construction works that generate noise that is: <ul style="list-style-type: none"> no more than 5 dB(A) above rating background level at any residence in accordance with the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009); and no more than the noise management levels specified in Table 3 of the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009) at other sensitive receivers; or for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm; 	SR	Construction of each stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> works approved through an EPL, or works as approved through the out-of-hours work protocol outlined in the CEMP. 					
5E	During site inductions and toolbox talks, all site workers (including subcontractors and temporary workforce) are to be made aware of the hours of construction and how to apply practical, feasible and reasonable measures to minimise noise and vibration when undertaking construction activities.	SR	Construction of each stage of development	Y	Y	Y
5F	Quieter and less vibration-emitting construction methods would be applied where feasible and reasonable. For example, when piling is required, bored piles rather than impact-driven piles would minimise noise and vibration impacts.	SR	Construction of each stage of development	Y	Y	Y
5G	The construction site would be arranged to minimise noise impacts by locating potentially noisy activities away from the nearest receivers wherever possible.	SR	Construction of each stage of development	Y	Y	Y
5H	Where possible, equipment that emit directional noise would be oriented away from sensitive receptors.	SR	Construction of each stage of development	Y	Y	Y
5I	Reversing of vehicles and mobile equipment would be minimised so as to prevent nuisance caused by reversing alarms. This could be achieved through one-way traffic systems and the use of traffic lights which could also limit the use of vehicle horns.	SR	Construction of each stage of development	Y	Y	Y
5J	Where work is proposed in the vicinity of residences, potentially affected residents would be advised, at least two weeks prior to the commencement of works, of the potential noise and vibration levels and the proposed management measures to control environmental impacts.	SR	Construction of each stage of development	Y	Y	Y
5K	Whenever possible, loading and unloading areas would be located away from the nearest residences.	SR	Construction of each stage of development	Y	Y	Y
5L	Broadband reversing alarms would be considered instead of tonal reversing alarms, in particular outside standard working hours (such as during night-time rail possession works).	SR	Construction of each stage of development	Y	Y	Y

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
5M	Equipment that is used intermittently would be shut down when not in use for extended periods of time.	SR	Construction of each stage of development	Y	Y	Y
5N	Where possible, all engine covers would be kept closed while equipment is operating.	SR	Construction of each stage of development	Y	Y	Y
5O	Where possible, trucks associated with the work would not be left standing with their engines operating in streets adjacent to or within residential areas.	SR	Construction of each stage of development	Y	Y	Y
5P	Traffic speeds would be signposted. All drivers would be expected to comply with speed limits and to implement responsible driving practices to minimise noise associated with unnecessary acceleration and braking. Traffic movements should be scheduled to minimise continuous traffic flows (convoys).	SR	Construction of each stage of development	Y	Y	Y
5Q	The site manager (as appropriate) should provide a community liaison phone number and permanent site contact so that any noise and/or vibration related complaints can be received and addressed in a timely manner. Consultation and cooperation between the site and its neighbours would assist in limiting uncertainty, misconceptions and adverse reactions to noise and vibration.	SR	Construction of each stage of development	Y	Y	Y
5R	Attended noise and ground vibration measurements would be undertaken at monthly intervals in areas within close proximity to sensitive receivers and upon receipt of adverse comment/complaints during the construction program, to confirm that noise and vibration levels at adjacent communities and receptors are consistent with the predictions in this assessment and any approval and/or licence conditions.	SR	Construction of each stage of development	Y	Y	Y
5S	If noise generating construction works are undertaken outside the standard daytime construction hours and/or measured construction noise levels at nearest residences are greater than 75 dB(A) LAeq, the following additional noise mitigation measures would be considered:	SR	Construction of each stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<p>Localised acoustic screens, comprising a solid structure such as plywood fencing to surround noise generating construction plant or work locations. To be effective for ground level noise, the screens would be lined with acoustic absorptive material, at least 2 m in height and installed within 5 m of the noise source.</p> <p>Dominant noise-generating mechanical plant would be fitted with feasible noise mitigation controls such as exhaust mufflers and engine shrouds.</p> <p>Respite periods of one hour are recommended for every continuous three-hour period of work; alternatively, daytime works would be scheduled between 9.00 am and 12.00 pm, and between 2.00 pm and 5.00 pm</p> <p>Where practical, and when night works are being undertaken, noisy construction work would be undertaken during the less sensitive 6.00 pm to 10.00 pm evening period</p>					
5T	<p>Depending on the specific construction works undertaken, construction noise mitigation may need to be implemented:</p> <ul style="list-style-type: none"> where piling works (required for all rail access connection options) are undertaken within approximately 600 m of residences in Casula and within approximately 800 m of residences in Glenfield; for rail access connection works where daytime construction works undertaken within 450 m of nearest receptors in Casula; and where rail construction is required up to 1400 m from residences outside the standard daytime hours, such as during track possession works. 	SR	Construction of each stage of development	N	Y	N
Operational Noise and Vibration						
5U	To achieve the noise reductions outlined in Table 7.30 of the <i>Response to Submissions report</i> and the <i>Revised Project Noise and Vibration Impact Assessment report</i> in Appendix F, mitigation treatments may be required to reduce noise from all dominant noise sources. The Project would implement reasonable and feasible noise mitigation to control potential noise levels. In the event that the Project does not meet the assessment criteria at receptors, if the	SR	Detailed design and operation of each stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<p>Project has reduced noise levels to be as low as practicable, the NSW Industrial Noise Policy (INP) (EPA 2000b) notes that:</p> <p>achievable noise limits can be negotiated with regulators and the community; and</p> <p>the Project specific noise mitigation measures and noise levels outlined in Table 7.30 of this report and in the Noise and Vibration Assessment (Appendix F) should not automatically be interpreted as conditions for approval without consideration of other factors (environmental, social and economic) consistent with the objectives of the EP&A Act. In this regard, where appropriate, the INP notes that noise limits can be set above the Project specific noise levels</p>					
5V	Where practical, operational plant and equipment would be selected to reduce noise emissions.	SR	Operation of each stage of development	Y	N	Y
5W	Mechanical components on fixed and mobile equipment, such as motors, gearboxes and exhausts, would include enclosures and acoustic insulation (lagging) (as necessary) to limit noise emissions.	SR	Operation of each stage of development	Y	N	Y
5X	Where feasible, motors and mechanical noise-generating components of the rail mounted gantries (RMGs) would be located near to ground level rather than at the top of the gantry.	SR	Detailed design and operation of each stage of development	Y	N	N
5Y	Where reasonable and feasible, and where it would produce a lower noise emission, electric motors would be operated instead of diesel powered equipment.	SR	Operation of each stage of development	Y	N	Y
5Z	<p>The following measures would be considered and where possible incorporated into the design and operation of the freight trains on the rail track on the main IMT site to control potential operational noise:</p> <ul style="list-style-type: none"> The track on the rail access connection would be designed to minimise adverse changes in vertical alignment, to reduce the requirement for locomotives to operate at high throttle on the ascent or under heavy braking on the descent. 	SR	Detailed design and operation of each stage of development	Y	N	N

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	The rail access connection bridge would be designed as a concrete or composite/concrete structure or more suitably noise mitigating structure to minimise potential re-radiated noise from vibrating sections of the elevated track. Detailed noise analysis would be undertaken to identify both airborne and re-radiated noise contributions, to effectively mitigate total noise emissions.	SR	Detailed design and operation of each stage of development	Y	N	N
	Locomotives accessing the main IMT site should have approval to operate on the network consistent with the noise limits for locomotives detailed in the ARTC Environmental Protection Licence No. 3142.	SR	Operation of each stage of development	Y	N	N
5AA	Unless for health and safety reasons, heavy vehicles should avoid the use of horns within the main IMT site.	SR	Operation of each stage of development	Y	N	N
5AB	To further control potential rail noise from wheel squeal the following measures are proposed: <ul style="list-style-type: none"> Track greasing systems should be investigated on curved sections of track to lubricate and reduce friction at the wheel– rail interface. The track maintenance system would include measures such as grinding to remove rail roughness, treatment of roughness on the wheels of locomotives and wagons, and adjustment of bogie-suspension tracking and brake system set up. 	SR	Detailed design and operation of each stage of development	Y	Y	N
5AC	Where feasible, all rail tracks would be designed to maximise the separation distance between rail lines and the nearest residences.	SR	Detailed design	Y	Y	N
5AD	Noise walls or noise barriers would be installed within the main IMT site where required In regard to noise walls or barriers, if required: <ul style="list-style-type: none"> Noise walls/barriers would need to be solid structures, typically constructed of concrete or similar material. Additional absorptive material could be applied to the internal facades of the noise walls/barriers to reduce reflected noise from the wall/barriers. 	SR	Detailed design and operation of each stage of development	Y	N	N

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> TEU containers could be used as noise barriers where they are stacked, to effectively impede the direct line of sight to nearest receptors. Onsite noise walls/barriers would be constructed at the earliest opportunity in the Project development to provide noise attenuation during all subsequent construction and operation phases. Subject to further consideration of environmental, social and economic impacts, earth mounding could be considered as an alternative to, or in conjunction with, noise walls/barriers to attenuate the propagation of noise between the site and nearest affected receptors. For the southern rail access, it is proposed that earth mounding be considered on the main IMT site, at the western extent of the IMEX and interstate rail lines. 					
5AE	Where feasible, all onsite buildings and structures would be designed and constructed to impede noise from ground level operation of heavy vehicles, side picks and ITVs.	SR	Detailed design	Y	N	Y
Operational Noise Management						
5AF	Before the start of each phase of operations, an operational noise and vibration management plan (ONVMP) (or equivalent) would be developed and implemented. The ONVMPs would detail the operation of the relevant Project phase, the potential offsite operational noise levels as determined during the detailed design process, and all measures to manage and mitigate operational noise and vibration.	SR	Pre-operation and operation of each stage of development	Y	Y	Y
5AG	<p>As a minimum, the ONVMP (or equivalent) would include:</p> <ul style="list-style-type: none"> the operational noise criteria/limits as defined by the relevant Project approvals and Environmental Protection Licence; identification of all surrounding receptors and land use that would be potentially sensitive to noise and vibration; 	SR	Pre-operation and operation of each stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> identification of all noise and vibration generating operations and the timing of these operations; the location and specification of any onsite and offsite noise mitigation, including the requirement for future mitigation as part of the staged operation; detailed measures for managing operational noise, including checklist and auditing procedures to ensure measures are implemented before the start of noise generating activity; procedures for the monitoring and reporting of operational noise and vibration; procedures for consultation with the community regarding operational noise and vibration; and complaint handling procedures. 					
5AH	<p>During detailed design, where practical and feasible to do so, consideration would be given to:</p> <ul style="list-style-type: none"> undertaking locomotive maintenance during the daytime and evening period between 7.00 am and 10.00 pm; operating heavy vehicles to limit the requirement for reversing and audible reversing alarms; and appropriate management measure – either contractual or operational – that rail operators accessing the site would be required to undertake regular maintenance of all trains to address wheel flat spots and locomotive exhausts. 	SR	Pre-operation and operation of each stage of development	Y	Y	Y
Further Assessment						
5AJ	The noise and vibration measures described in 5U–5AH above would be subject to further consideration during detailed design. At that point, the predicted noise impacts and the likely effectiveness of the measures (or equivalent alternative measures) would be further investigated. This further investigation would include consideration of potential environmental, social and economic impacts of the measures.	M (SR – mitigation measures)	Detailed design	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<p>It is also proposed that the following points be considered in the further assessment of potential impacts and design of mitigation measures:</p> <p>Assessment of potential noise emissions from any concrete batching plant, and implementation of any required noise mitigation, would be undertaken by the appointed construction contractor upon confirmation of the design and operation of the concrete batching plant.</p> <p>During detailed design of the Project, consideration of either an automated container handling area or electrically powered plant for the interstate terminal (as per the IMEX terminal), or alternatively the use of plant with the lowest available noise emissions.</p> <p>During the detailed design of the Project, more detail on the operating plant and machinery for the Project may be known. This may include the provision of one-third octave band noise emission data from equipment vendors to facilitate a detailed assessment of annoyance characteristics in accordance with the NSW Industrial Noise Policy (INP) (EPA 2000b).</p> <p>To the west of the site, consideration of a noise barrier 4.5 m in height at the haul road to mitigate noise from trucks operating within the Project site using a combination of acoustic barriers, solid walls or earth mounding to fully impede the line of sight between the nearest receptors in Casula and the haul road.</p> <p>To verify the predicted noise levels and recommended noise mitigation in the noise and vibration assessment, the predictive assessment of potential noise levels would be revised for the detailed design of the construction and operation of the southern rail access. This would include an assessment of sleep disturbance impacts from rail spur operations. Where deemed necessary, mitigation measures may be required to reduce and control maximum noise events from sources such as locomotive exhausts and wagon bunching.</p> <p>The specific vibration propagation characteristics can be highly variable depending on the ground conditions at a given location. It is recommended that ground vibration impacts be reviewed during the</p>					

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing

detailed design, particularly where Project rail track would pass within 50 m of residences.

Noise and Vibration Monitoring

5AK	<p>The ambient noise monitoring surveys within Casula, Wattle Grove and Glenfield would be continued throughout the construction and operation of the Project (with annual reporting of noise results up to two years beyond the completion of Full Build). The noise surveys would quantify any potential noise from the Project and identify any trends/changes in the ambient noise environment during the progressive development.</p> <p>The measured noise levels and contribution from the operation of the Project would be continually applied to the detailed design of the Project to ensure it includes appropriate mitigation measures to reduce and control noise during construction and operation. The monitoring data would also include any changes to the ambient noise environment from new or changed developments in the area.</p> <p>In the event of any noise or vibration related complaint or adverse comment from the community, noise and ground vibration levels would be measured at the potentially affected premises, where reasonable and feasible. In accordance with procedures in the CNVMP and ONVMP, the measured noise and/or vibration levels would then be assessed to ascertain if remedial action is required</p>	SR	Detailed design, construction and operation of each stage of development	Y	Y	Y
------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----	--------------------------------------------------------------------------	---	---	---

Biodiversity

6A	<p>Following detailed design and before construction, detailed flora and fauna mitigation measures would be developed and presented as part of the CEMP. These detailed measures would incorporate the measures listed in 6B to 6W. The CEMP would address:</p> <ul style="list-style-type: none"> • general impact mitigation; • staff/contractor inductions; • vegetation clearing protocols; • pre-clearing surveys and fauna salvage/translocation; • rehabilitation and restitution of adjoining habitat; 	M	Early Works construction of each stage of development	Y	Y	Y
-----------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---	-------------------------------------------------------	---	---	---

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> weed control; pest management; and monitoring. The plans would include clear objectives and actions for the Project including how to: <ul style="list-style-type: none"> minimise human interferences to flora and fauna; minimise vegetation clearing/disturbance; minimise impact to threatened species and communities; minimise impacts to aquatic habitats and species; and undertake flora and fauna monitoring at regular intervals. 					
6B	Vegetation clearing would be restricted to the construction footprint and sensitive areas would be clearly identified as exclusion zones.	M	Early Works and construction of each stage of development	Y	Y	Y
6C	The exclusion zones would be marked on maps, which would be provided to contractors, and would also be marked on the ground using high visibility fencing (such as barrier mesh).	M	Early Works and construction of each stage of development	Y	Y	Y
6D	A trained ecologist would accompany clearing crews to ensure disturbance is minimised and to assist in relocating any native fauna to adjacent habitat.	M	Early Works and construction of each stage of development	Y	Y	Y
6E	A staged habitat removal process would be developed and would include the identification and marking of all habitat trees in the area. Where reasonable and feasible, clearing of hollow-bearing trees would be undertaken in March and April when most microbats are likely to be active (not in torpor) but are unlikely to be breeding or caring for young, and when threatened hollow-dependent birds in the locality are also unlikely to be breeding.	M	Early Works and construction of each stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<p>Pre-clearing surveys would be conducted 12 to 48 hours before vegetation clearing to search for native wildlife (e.g. reptiles, frogs, Cumberland Land Snail) that can be captured and relocated to the retained riparian vegetation of the Georges River corridor.</p> <p>Vegetation would be cleared from a 10 m radius around habitat trees to encourage animals roosting in hollows to leave the tree. A minimum 48 hour waiting period would allow animals to leave.</p> <p>After the waiting period, standing habitat trees would be shaken (where safe and practicable) under the supervision of an ecologist to encourage animals roosting in hollows to leave the trees, which may then be felled, commencing with the most distant trees from secure habitat.</p> <p>Felled habitat trees would either be immediately moved to the edge of retained vegetation, or left on the ground for a further 24 hours before being removed from the construction area, at the discretion of the supervising ecologist.</p> <p>All contractors would have the contact numbers of wildlife rescue groups and would be instructed to coordinate with these groups in relation to any animal injured or orphaned during clearing.</p> <p>Within areas of high quality intact native vegetation proposed to be removed:</p> <ul style="list-style-type: none"> • topsoil (and seedbank) is to be collected from native vegetation that are to be permanently cleared and used in the revegetation of riparian areas; and • Native plants in areas that are to be permanently cleared are to be relocated and transplanted in riparian areas identified for rehabilitation. 					
6F	Relocation of fauna to adjacent retained habitat would be undertaken by an ecologist during the supervision of vegetation removal.	M	Early Works and construction of each stage of development	Y	Y	Y
6G	An ecologist would supervise the drainage of any waterbodies on the Project site and would relocate native fish (e.g. eels), tortoises and frogs to the edge of the Georges River and/or the existing pond at the northern end of the IMT site.	M	Early Works and construction of each stage of development	Y	Y	Y

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
6H	The design of site fencing and any overhead powerlines would consider the potential for collision by birds and bats and minimise this risk where practicable.	M	Early Works and construction of each stage of development	Y	Y	Y
6I	The potential for translocation of threatened plant species as individuals or as part of a soil translocation process would be considered during the detailed development of the CEMP.	M	Early Works and construction of each stage of development	Y	Y	Y
6J	Consideration would be given to fitting roost boxes to the bridge over the Georges River to provide roost sites for the Large-footed Myotis and other species of microbats (e.g. Eastern Bentwing-bat) which may utilise such structures. Provision of roost boxes under bridges has been identified as priority action for the recovery of the Large-footed Myotis.	SR	Detailed design	N	Y	N
6K	Important habitat elements (e.g. large woody debris) would be moved from the construction area to locations within the conservation area which would not be cleared during the Project, or to stockpiles for later use in vegetation/habitat restoration.	M	Pre-construction	Y	Y	Y
6L	Winter-flowering trees would be preferentially planted in landscaped areas of the Project site to provide a winter foraging resource for migratory and nomadic nectar-feeding birds and the Grey-headed Flying-fox.	SR	Construction of each stage of development	Y	Y	Y
6M	A bridge/viaduct or similar design would be used for the railway crossing of the Georges River. This may allow connectivity of terrestrial habitat along the river banks underneath the bridge.	M (connectivity SR)	Detailed design	N	Y	N
6N	Options for maintaining habitat connectivity would be investigated, and may include establishing native vegetation and placing habitat elements such as rock piles and large woody debris under the bridge to provide cover for fauna. Where reasonable and feasible options to allow light and moisture to penetrate under the Georges River bridge will be incorporated into the detailed design	SR	Detailed Design	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
6O	Erosion and sediment control measures such as silt fencing and hay bales would be used to minimise sedimentation of streams and resultant impacts on aquatic habitats and water quality.	M	Early works and construction of each stage of development	Y	Y	Y
6P	The detailed design process for the bridge over the Georges River would consider disturbance to aquatic habitat and fish passage conditions. The design would as a minimum adhere to the fish friendly passage guidelines (Fairfull & Witheridge 2003) for waterway crossings.	M	Detailed design	N	Y	N
6Q	Opportunities for planting of detention basins with native aquatic emergent plants and fringing trees would be explored in the detailed design of the Project and, if practicable, implemented so that they would provide similar habitat in the medium term to that lost through the removal of existing basins.	SR	Detailed design	Y	N	N
6R	The CEMP (or equivalent) would include detailed measures for minimising the risk of introducing weeds and pathogens.	M	Construction of each stage of development	Y	Y	Y
6S	The Project would include a long-term program for the duration of the Project operation of weed removal and riparian vegetation restoration within parts of the Georges River corridor, which would include monitoring landscaped areas for the presence of noxious and environmental weeds. A preliminary weed management strategy is provided in Appendix E of Technical Paper 3 – Ecological Impact Assessment in Volume 4 of the EIS, setting out the principles for the management of the riparian zone.	M	Pre-construction, construction and operation of each stage of development	Y	N	N
6T	Appropriate design and landscape/vegetation management measures would be implemented to reduce the bushfire risk and threat to biodiversity.	M	Detailed design of each stage of development	Y	Y	Y
6U	The management of the conservation area along the Georges River would include management of fire regimes to promote biodiversity conservation.	M	Pre-construction, construction and operation of each stage of development	Y	Y	N

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
6V	The detailed design process would consider the potential groundwater impacts on ground-dependent ecosystems. In most cases, these impacts would be mitigated at the design phase.	M	Detailed design	Y	Y	Y
6W	The management plan for the Georges River riparian corridor (refer to Appendix E of Technical Paper 3 – Ecological Impact Assessment in Volume 4 of the EIS) would be implemented and would include a monitoring program designed to detect operational impacts.	M	Operation of each stage of development	Y	N	N
6X	Ongoing monitoring of macroinvertebrate communities will be undertaken prior to, during and following construction upstream and downstream of the proposed impact at the Georges River Bridge and reference locations to assist identify any changes in aquatic communities.	M	Pre-construction and construction of each stage of development	Y	Y	N
6Xi	<u>Directional lighting will be used where lighting is required within the construction area. Lights would be directed away from the riparian vegetation adjoining the Georges River as far as is practicable.</u>	<u>M</u>	<u>Construction of each stage of development</u>	<u>N</u>	<u>N</u>	<u>Y</u>
Biodiversity Offset Strategy						
6Y	The Biodiversity Offsets Strategy detailed in Appendix C of the MPW Concept Approval Response to Submissions Report will be implemented.	M	Detailed design, construction and operation of each stage of development	Y	Y	Y
6Z	A riparian restoration plan (or equivalent) for the Georges River riparian zone and Casula offset area would be implemented. This plan includes areas outside the Conservation Area, including areas along the western bank of the Georges River The objectives of the plan include: <ul style="list-style-type: none"> improved habitat values for native animals and plants, particularly threatened species; and 	M	Detailed design, construction and operation of each stage of development	Y	N	N

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> management of undesirable fauna species including introduced animal species and some Australian native animals which may be detrimental to the biodiversity of the Project site. 					
6AA	<p>Measures to manage undesirable fauna species include:</p> <ul style="list-style-type: none"> monitoring of the site for the presence of introduced and undesirable animal species as part of fauna monitoring; cooperating with government bodies, interest groups and adjacent landowners in regional pest management programs including the NSW Department of Primary Industries and the NSW Office of Environment and Heritage; managing the use of nest boxes by undesirable species by removing the eggs and/or young of introduced animals (e.g. Black Rat and Common Myna) under appropriate permit conditions; removing any insect colonies (bees, wasps, termites, ants found in nest boxes); and modifying or moving nest boxes to discourage use by undesirable species. 	SR	Construction and operation of each stage of development	Y	Y	Y
Hazards and Risks						
7A	<p>To minimise the risk of leakages involving natural gas, liquid natural gas (LNG) and flammable and combustible liquids to the atmosphere:</p> <ul style="list-style-type: none"> appropriate standards for a gas reticulation network, including AS 2944-1 (2007) and AS 2944-2 (2007), would be referred to in the detailed design process; correct schedule pipes would be used; a fire protection system would be installed if necessary for gas users; 	M	Detailed design, construction and operation	Y	Y	Y

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> cathodic protection would be installed for external corrosion if appropriate; and access to the Project site would be secure. 					
7B	<p>To minimise the risks of leakage of LNG and liquid petroleum gas (LPG) and flammable liquids during transport:</p> <ul style="list-style-type: none"> materials would be transported according to the Australian Dangerous Goods (ADG) Code, relevant standards and regulations; and contractors delivering the gas would be trained, competent and certified by the relevant authorities. 	M	Detailed design, construction and operation	Y	Y	Y
7C	<p>To minimise hazards associated with venting of natural gas, LNG and LPG:</p> <ul style="list-style-type: none"> LNG storage would be designed to AS/NZS 1596-2008 standards; access to the Project site would be secure; and significant separation distances to residences and other assets would be put in place. 	M	Detailed design, construction and operation	Y	Y	Y
7D	Storage of flammable/combustible liquids would be carried out in accordance with AS 1940, with secondary containment in place and location away from drainage paths.	M	Detailed design, construction and operation of each stage of development	Y	Y	Y
7E	Standby or emergency generators and transformers would all have secondary containment.	M	Detailed design, construction and operation of each stage of development	Y	Y	Y
7F	Oil coolers would generally be located in areas where leaks and runoff are appropriately controlled at source or in a retention basin.	M	Detailed design, construction and operation of each stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	IMT site	Applicability	
					Southern Rail Access	Warehousing
7G	All systems would be designed in accordance with good engineering practice.	M	Detailed design	Y	Y	Y
7H	Appropriate testing, alarm systems, and workplace health and safety (WHS) safety precautions would be implemented.	M	Detailed design	Y	Y	Y
7I	No hazardous or regulated wastes would be disposed of onsite.	M	Construction and operation of each stage of development	Y	Y	Y
7J	All offsite disposals would be carried out by approved transport operators and to approved facilities.	M	Construction and operation of each stage of development	Y	Y	Y
7K	Other dangerous goods, including any waste materials present on the Project site, would be suitably contained, with secondary containment and runoff controls implemented where appropriate to prevent leaks or spills migrating to environmentally sensitive areas, in particular via stormwater systems that drain to the Georges River.	M	Construction and operation of each stage of development	Y	Y	Y
Bushfire Risks						
7L	The aims and objectives of 'Planning for Bush Fire Protection' (RFS 2006) would be further considered, and the Rural Fire Service (RFS) consulted, during detailed design.	SR	Detailed design	Y	Y	Y
7M	<p>A bushfire management plan (or equivalent) would be prepared for the Project site to develop the bushfire management measures in detail, in consultation with the RFS. The bushfire management plan (or equivalent) would detail the interaction between the Project footprint and biodiversity offset areas.</p> <p>In the event that no vegetation clearing is undertaken, the bushfire risk assessment and bushfire management plan (or equivalent) would be updated and appropriate mitigation measures provided in the design of the IMT</p>	M	Detailed design	Y	Y	Y

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
7N	Internal roads would be designed and maintained to enable safe access for emergency services and to allow crews to work with equipment aboard the vehicle, including providing: <ul style="list-style-type: none"> two-wheel drive, sealed all weather roads; internal perimeter road to be at least two lanes wide (8 m kerb to kerb); a minimum vertical clearance of 4 m; curves with a minimum inner radius of 6 m; and roads with capacity to carry fully loaded fire-fighting vehicles (15 tonnes). 	M	Detailed design	Y	Y	Y
7O	Water supplies for fire-fighting would be easily accessible and located at regular intervals, including: <ul style="list-style-type: none"> reticulated water supply using a ring main system for the perimeter road; fire hydrant spacing, sizing and pressures complying with AS 2419.1–2005; location of hydrants outside of any road carriageway; and ensuring all aboveground water pipes external to buildings are metal, including any taps. 	M	Detailed Design	Y	Y	Y
7P	Electricity services would be located to limit the possibility of ignition of surrounding bushland or the fabric of buildings, including: <ul style="list-style-type: none"> where practicable, locating electrical transmission lines underground; where overhead electrical transmission lines are proposed, lines would be installed with short pole spacing (30 m); and no part of a tree would be closer to a power line than the distance set out in the specifications of Vegetation Safety Clearances issued by Energy Australia (NS179, April 2002). 	M	Detailed design	Y	Y	Y
7Q	Gas services would be located to avoid ignition of surrounding bushland or the fabric of buildings, including:	M	Detailed design	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	IMT site	Applicability	
					Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> ensuring all aboveground gas service pipes external to buildings are metal (including connections); and ensuring reticulated or bottled gas is installed and maintained in accordance with AS 1596 and the requirements of relevant authorities. 					
7R	A fuel management plan (or equivalent) would be developed for the conservation zone and offset areas taking into consideration the ecological values of this area, including the presence of threatened biodiversity.	M	Detailed design	Y	N	N
7S	A landscape management plan (or equivalent) would be developed for any landscaped gardens within the Project site.	M	Detailed design	Y	N	Y
7T	<p>A fire safety and evacuation plan (or equivalent) would be developed that would:</p> <ul style="list-style-type: none"> include training requirements for staff on fire prevention and safety; provide a fire escape plan (designated meeting points and escape routes), and require regular fire drills; outline provision of a functional fire alarm system; outline equipment use restrictions during fire bans; and outline measures for arson prevention, including provision of adequate lighting and security to deter trespassers. 	M	Detailed design	Y	Y	Y
7U	A more detailed bushfire risk assessment would be undertaken following finalisation of design and layout, in consultation with the NSW Rural Fire Service.	M	Detailed design	Y	Y	Y
Contamination of Soils						
8A	Further investigations for the southern rail access would be undertaken including a targeted intrusive investigation to gather data on soils and groundwater quality so that management and/or remediation options can be evaluated.	M	Detailed design	N	Y	N
8B	Before construction, a remediation program would be implemented in accordance with the Moorebank Intermodal Terminal Preliminary	M	Detailed design, preconstruction	Y	Y	Y

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	Remediation Action Plan (RAP) (or equivalent). The program will have been formally reviewed and approved by the Site Auditor under Part 4 of the NSW Contaminated Land Management Act 1997 (CLM Act).		and construction of each development stage			
8C	A CEMP would be prepared by the contractor for all excavation and remediation works and would include requirements for decontamination facilities at the Project site.	M	Detailed design and Early Works	Y	Y	Y
8D	An unexploded ordnance (UXO) management plan (or equivalent) would be developed for the Project site. This plan would detail a framework for addressing the discovery of UXO or explosive ordnance waste (EOW) to ensure a safe environment for all Project staff, visitors and contractors.	M	Early Works	Y	N	Y
8E	An ASS management plan (or equivalent) would be developed in accordance with the ASSMAC Assessment Guidelines (1998), with active ongoing management through the construction phases. Offsite disposal would need to be in accordance with the NSW Waste Classification Guidelines Part 4: Acid Sulfate Soils (2009).	M (testing and disposal requirement) SR (ASS management plan (or equivalent))	Detailed design	Y	N	Y
8F	Further testing of residual sediments would be undertaken to gather data to inform the management of sediments likely to be disturbed/dewatered during construction.	M	Detailed design	Y	N	Y
8G	Ground penetrating radar (GPR) or similar techniques would be used to locate and document all existing and underground tank infrastructure across the Project site.	M	Detailed design	Y	N	Y
8H	A management tracking system for excavated materials would be developed to ensure the proper management of the material movements at the Project site, particularly during excavation works.	M	Detailed design	Y	Y	Y
8I	Contaminated soil/fill material present will be 'chased out' during the excavation works based on visual, olfactory and preliminary field test results.	M	Construction of each stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
8J	Excavated soil would be temporarily stockpiled, sampled and analysed for waste classification processes. Subject to receipt of waste classification results, the material would be transported to a licensed offsite waste disposal facility as soon as practicable to minimise dust and odour issue through storage of materials on site.	M	Construction of each stage of development	Y	Y	Y
8K	Stockpiled soils would be stored on a sealed surface and the stockpiled areas would be securely bunded using silt fencing to prevent silt laden surface water from entering or leaving the stockpiles or the Project site.	M	Construction of each stage of development	Y	Y	Y
8L	All excavation works associated with potential contaminated lands would be undertaken by licensed contractors, experienced in remediation projects and the handling of contaminated soils.	M	Construction of each stage of development	Y	Y	Y
8M	All asbestos removal, transport and disposal would be performed in accordance with the Work Health and Safety Regulation 2011 (WHS Regulation).	M	Construction of each stage of development	Y	Y	Y
8N	The removal works would be conducted in accordance with the National Occupational Health and Safety Commission Code of Practice for the Safe Removal of Asbestos, 2nd Edition [NOHSC 2002 (2005)] (NOHSC 2005a).	M	Construction of each stage of development	Y	Y	Y
8O	An appropriate asbestos removal licence issued by WorkCover NSW would be required for the removal of asbestos contaminated soil.	M	Construction of each stage of development	Y	Y	Y
8P	Environmental management and WHS procedures would be put in place for the asbestos removal during excavation to protect workers, surrounding residents and the environment.	M	Construction of each stage of development	Y	Y	Y
8Q	Temporary stockpiles of asbestos containing material (ACM) soils would be covered to minimise dust and potential asbestos release.	M	Construction of each stage of development	Y	Y	Y
8R	An asbestos removal clearance certification would be prepared by an occupational hygienist at the completion of the removal work. This would follow the systematic removal of asbestos containing materials and any affected soils from the Project site, and validation of these	M	Construction of each stage of development	Y	Y	Y

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	areas (through visual inspection and laboratory analysis of selected soil samples).					
8S	Asbestos fibre air monitoring would be undertaken during the removal of ACMs and in conjunction with the visual clearance inspection. The monitoring would be conducted in accordance with the National Occupational Health and Safety Commission Guidance Note on the Membrane Filter Method For the Estimating Airborne Asbestos Fibre, 2nd Edition [NOHSC 3003 (2005)] (NOHSC 2005b).	M	Construction of each stage of development	Y	Y	Y
8T	All stockpiles would be maintained in an orderly and safe condition. Batters would be formed with sloped angles that are appropriate to prevent collapse or sliding of the stockpiled materials.	M	Construction of each stage of development	Y	Y	Y
8U	Stockpiles would be placed at approved locations and would be strategically located to mitigate environmental impacts while facilitating material handling requirements. Contaminated or potentially contaminated materials would only be stockpiled in un-remediated areas of the Project site or at locations that did not pose any risk of environmental impairment of the stockpile area or surrounding areas (e.g. hardstand areas).	M	Construction of each stage of development	Y	Y	Y
8V	Stockpiles would only be constructed in areas of the Project site that had been prepared in accordance with the requirements of the Project Preliminary RAP in Appendix F of Technical Paper 5 – Environmental Site Assessment (Phase 2), Volume 5A and 5B. All such preparatory works would be undertaken before material is placed in the stockpile. Stockpiles must be located on sealed surfaces such as sealed concrete, asphalt, high density polyethylene or a mixture of these, to appropriately mitigate potential cross contamination of underlying soil.	M	Construction of each stage of development	Y	Y	Y
8W	Any stockpiles of contaminated material would be covered with a waterproof membrane (such as polyethylene sheeting) to prevent increased moisture from rainwater infiltration and to reduce wind-blown dust or odour emission.	M	Construction of each stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
8X	Before the reuse of any material on site, it would be validated so that the lateral and vertical extent of the any potential contamination is defined.	M	Construction of each stage of development	Y	Y	Y
8Y	Where required, contaminated materials and wastes generated from the Project remediation and construction works would be taken to suitable licensed offsite disposal facilities.	M	Construction of each stage of development	Y	Y	Y
8Z	Where necessary, consider undertaking further investigations to determine whether other buildings have organochlorine pesticides (OCP) impacts subgrade materials, and to quantify the volume of OCP impacted materials across the site.	SR	Construction of each stage of development	Y	N	Y
8AA	Additional Aqueous Film Forming Foam Assessment (AFFF) be undertaken to determine if any direct remedial and/or management actions are required. A staged approach is considered appropriate and is detailed in the Preliminary AFFF Assessment (Golder Associates 2015b).	SR	Construction of each stage of development	Y	N	N
8AB	<u>Quality control aspects relating to permanent clean general fill and risks associated with temporary stockpiling would be addressed and managed by a site-specific earthworks specification. This document is to be prepared in consideration of the final design layout adopted, and requirements relating to the stockpiling during the construction of the relevant stage of development of the MPW Project.</u>	<u>SR</u>	<u>Construction of each stage of development</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
8AC	<p><u>In order to accept fill material onto site, the following will be undertaken:</u></p> <ul style="list-style-type: none"> <u>Material characterisation reports/certification showing that the material being supplied is VENM/ENM must be provided.</u> <p><u>Each truck entry will be visually checked and documented to confirm that only approved materials that are consistent with the environmental approvals are allowed to enter the site. Only fully tarped loads are to be accepted by the gatekeeper.</u></p>	<u>M</u>	<u>Construction of each stage of development</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
<u>Environmental Assurance of imported fill material will be conducted to confirm that the materials comply with the NSW EPA Waste Classification Guidelines and the Earthworks Specification for the MPW site. The frequency of assurance testing will be as nominated by the Environmental assessor/auditor.</u>						
Hydrology, Groundwater and Water Quality						
9A	A soil and water management plan (or equivalent) would be developed before work begins in the conservation area. This plan would include erosion and sediment control plans (ESCPs) and procedures to manage and minimise potential environmental impacts associated with developing this area.	M	Early Works	Y	N	N
9B	Site compounds, stockpiling areas and storage areas for sensitive plant, equipment and hazardous materials would be located above an appropriate design flood level, which would be determined based on the duration of the construction works.	M	Early Works and Construction of each stage of development	Y	N	N
9C	<i>Stockpiling areas would be located no further west than the toe of the embankment on the western extent of the construction area excluding OSD outlet basin areas, or no closer than 100m from the George's river's eastern bank, whichever is greater.</i>	M	<i>Early Works and Construction of each stage of development</i>	Y	Y	Y
Regional Flooding						
9C	Implement a staged construction process for the building of the Georges River bridge that minimises temporary obstruction of flow in the main channel and floodplain where reasonable and feasible.	SR	Construction of each stage of development	N	Y	N
9D	For the building of the Georges River bridge, design temporary works to resist forces and pressures that could occur during the design flood event adopted for the Project construction.	M	Construction of each stage of development	N	Y	N

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	IMT site	Applicability	
					Southern Rail Access	Warehousing
9E	For all site works, provide temporary diversion channels around temporary work obstructions to allow low and normal flows to safely bypass the work areas.	M	Construction of each stage of development	Y	Y	Y
9F	The potential effects of various flood events on construction phase works would be further investigated during detailed design and preparation of the Stage 2 SSD approval(s).	M (investigation) SR (additional mitigation)	Detailed design	Y	Y	Y
9G	The design of the Georges River bridge would ensure structural stability under an appropriate upper limiting flood event, typically the 1 in 2000 year AEP event or other event of similar magnitude.	M	Detailed design	N	Y	N
9H	A detailed scour assessment of the structure would be undertaken and a scour protection scheme for the bridge abutments and piers would be designed to ensure structural stability and to avoid erosion of the channel and floodplain bed local to the structure.	M	Detailed design	N	Y	N
9I	Further design optimisation of the bridge would consider reducing the afflux impacts as far as possible. The bridge piers would be designed to minimise obstruction to flow and associated afflux under potential blockage and/or debris build-up scenarios.	SR	Detailed design	N	Y	N
9J	Further hydraulic modelling would be undertaken to quantify the impact of climate change on afflux caused by the bridge and on hydraulic loading on the bridge structure.	M	Detailed design	N	Y	N
Onsite stormwater and surface water quality						
9K	<p>The following staging process would be considered to be implemented when constructing surface water drainage infrastructure:</p> <p>Biofiltration and detention basins that form part of the proposed stormwater management strategy would be excavated at the first phase of development, with the intention that the excavated basins would be used as temporary construction phase sedimentation basins. Once these construction phases become operational, these temporary construction phase sedimentation basins could be developed into the permanent biofiltration and detention basins.</p>	M	Construction of each stage of development	Y	N	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	During the relevant phase of development, all major stormwater pipes and culverts (600 mm diameter and larger) and main channels and outlets would be installed. Minor drainage and upstream systems would then be progressively connected to the major drainage elements during each phase of construction as required.					
9L	<p>A soil and water management plan (or equivalent) would be developed before land was disturbed that would include erosion and sediment control plans (ESCPs) and procedures to manage and minimise potential environmental impacts associated with construction of the Project.</p> <p>The ESCP(s) for the Project would be prepared in accordance with Volume 1 of Managing Urban Stormwater: Soils and Construction ('the Blue Book') (Landcom 2004), <i>Managing Urban Stormwater: Soils and Construction: Installation of Services, Volume 2A</i> (OEH 2008) and Managing Urban Stormwater: Soils and Construction – Main Road Construction, Volume 2D (OEH 2008). The ESCP(s) would be established before the start of each construction phase and would be updated as relevant to the changing construction activities.</p> <p>Strategies to be considered as part of the plan include:</p> <ul style="list-style-type: none"> • clean runoff from upstream undisturbed areas would be diverted around the Project site to minimise overland flow through the disturbed areas; • stabilised surfaces would be reinstated as quickly as practicable after construction; • all stockpiled materials would be stored in bunded areas and away from waterways to avoid sediment-laden runoff entering the waterways; • sediment would be prevented from moving offsite and sediment-laden water prevented from entering any watercourse, drainage line or drainage inlet; • erosion and sediment control measures would be regularly inspected (particularly following rainfall events) to monitor their effectiveness and stability; 	M	Construction of each stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> erosion and sediment control measures would be left in place until the works are complete or areas are stabilised; temporary erosion control and energy dissipation measures would be installed to protect receiving environments from erosion; and vehicle movements would be managed during rainfall (or while the ground remains sodden) to minimise disturbance to the topsoil. 					
9M	Procedures to maintain acceptable water quality and to manage chemicals and hazardous materials (including spill management procedures, use of spill kits and procedures for refuelling and maintaining construction vehicles/equipment) would be implemented during construction.	M	Construction of each stage of development	Y	Y	Y
9N	Vehicles and machinery would be properly maintained to minimise the risk of fuel/oil leaks.	M	Construction of each stage of development	Y	Y	Y
9O	Routine inspections of all construction vehicles and equipment would be undertaken for evidence of fuel/oil leaks.	M	Construction of each stage of development	Y	Y	Y
9P	All fuels, chemicals and hazardous liquids would be stored within an impervious bunded area in accordance with Australian Standards and NSW Environment Protection Authority guidelines.	M	Construction of each stage of development	Y	Y	Y
9Q	Emergency spill kits would be kept onsite at all times. All staff would be made aware of the location of the spill kits and trained in their use.	M	Construction of each stage of development	Y	Y	Y
9S	Construction plant, vehicles and equipment would be refuelled offsite, or in designated re-fuelling areas located at least 50 metres from drainage lines or waterways.	M	Construction of each stage of development	Y	Y	Y
9T	If landfill cells at the Glenfield Waste site are to be affected, then a detailed assessment must be prepared including targeted intrusive investigations to determine contamination pathways and to develop mitigation, management and/or remediation options based on those	M	Detailed design	N	Y	N

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	investigations. No works within this licensed premise without EPA's written approval.					
9U	A stormwater management plan (or equivalent) would be developed in accordance with the detailed design. This includes the requirement to control the rate of stormwater runoff so that it does not exceed the pre-developed rate of runoff.	M	Detailed design	Y	Y	Y
9V	The stormwater system would be designed such that flow from low order events (up to and including the 10% AEP event from the main part of the site, and up to and including the 2% AEP event for the rail access connection corridor) would be conveyed within the formal drainage systems. Flows from rarer events (up to the 1% AEP event) would be conveyed in controlled overland flow paths.	M	Detailed design	Y	N	Y
9W	The onsite detention system proposed would detain flow and control discharge rates to the Georges River equal to pre- development discharge rates.	M	Detailed design	Y	N	Y
9X	A stormwater treatment system would be implemented, incorporating sedimentation and bio-filtration basins upstream of the stormwater detention basins.	M	Detailed design, construction, operation for each stage of development	Y	N	Y
9Y	Use of onsite infiltration would be incorporated into the design through the distribution of swale drains and rain gardens across the Project site.	M	Detailed design	Y	N	Y
9Z	A number of other stormwater management opportunities would be considered during development of the detailed design in accordance with Liverpool City Council's Development Control Plan Part 2.4 Development in Moorebank Defence Lands and other relevant policies, including: <ul style="list-style-type: none"> polishing water runoff using dry creek gravel beds with macrophyte plants; using drainage swales to slow down stormwater runoff and increase onsite infiltration; 	SR	Detailed design	Y	N	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	IMT site	Applicability	
					Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> collecting roof rainwater for re-use onsite; installing gross pollutant traps (GPTs) at the outlets of the pipe system before discharge into the sedimentation basins; and incorporating impervious surfaces and vegetated areas into the design to increase sub-surface water flow during rain events and to reduce the discharge of stormwater pollutants. 					
Groundwater						
9AA	Concrete structures and other subsurface infrastructure in areas that may potentially interact with local groundwater would be constructed from sulfate resistant cement and materials.	M	Detailed design and construction for each stage of development	Y	N	Y
9AB	Where required, water access entitlements such as groundwater licences would be obtained for dewatering activities, in accordance with the requirements of NSW Office of Water's proposed Aquifer Interference Policy.	M	Pre-construction for each stage of development	Y	N	Y
9AC	Groundwater quality would be tested to determine salinity levels and inform potential design measures to ensure the design life of any infrastructure is achieved.	M	Detailed design	Y	N	Y
9AD	Suitable groundwater monitoring where required would be established and undertaken before construction, during construction and during operation of the Project.	M	Pre-construction, construction and operation for each stage of development	Y	N	Y
9AE	To prevent the contamination of groundwater during Project construction and operation, suitable water treatment, water retention, water proofing and ground treatments would be investigated and implemented where required.	SR	Detailed design, construction and operation for each stage of development	Y	N	Y
9AF	Potential impacts on two existing groundwater bores in the vicinity of the proposal would be further investigated during detailed design.	SR	Detailed design	Y	N	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	Mitigation measures to minimise these impacts would also be developed as required.					
9AG	<p>The following groundwater assessments would be carried out:</p> <ul style="list-style-type: none"> an overall assessment of pre-construction groundwater quality and levels; characterisation of local and regional groundwater flow systems, including the groundwater contours and flow conditions; consideration of potential groundwater supply options, if required; assessment of impacts on groundwater levels and quality during construction and ongoing operation; confirmation of management and mitigation solutions for potential groundwater impacts; and assessment of the potential salinity impacts that may result from the Project. 	M	Detailed Design	Y		Y
Air Quality – Construction						
10A	A Dust Management Plan (DMP) (or equivalent) would be prepared as part of the CEMP.	M	Construction for each stage of development	Y	Y	Y
10B	Dust minimisation measures would be developed and implemented before commencement of construction. The NSW Coal Mining Benchmarking Study: Measures to Prevent and/or Minimise Emissions of Particulate Matter from Coal Mining (OEH 2011) would be considered.	M	Construction for each stage of development	Y	Y	Y
10C	Methods for management of emissions would be incorporated into Project inductions, training and pre-start talks.	M	Construction for each stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
10D	Activities with the potential to cause significant emissions, such as material delivery and load out and bulk earthworks, would be identified in the CEMP. Work practices that minimise emissions during these activities would be investigated and applied where reasonable and feasible.	M	Construction for each stage of development	Y	Y	Y
10E	A mechanism for raising and responding to complaints would be put in place for the duration of the construction phase.	M	Construction for each stage of development	Y	Y	Y
10F	Vehicle movements would be limited to designated entries and exits, haulage routes and parking areas. Project site exits would be fitted with hardstand material, rumble grids or other appropriate measures to limit the amount of material transported offsite (where required).	M	Construction for each stage of development	Y	Y	Y
10G	Work site compounds and exposed areas would be screened to assist in capturing airborne particles and reduce potential entrainment of particles from areas susceptible to wind erosion.	M	Construction for each stage of development	Y	Y	Y
10H	<p>Dust would be visually monitored during construction and the following measures would be implemented where necessary:</p> <ul style="list-style-type: none"> • Apply water (or alternative measures) to exposed surfaces that are causing dust generation. Surfaces may include any stockpiles, hardstand areas and other exposed surfaces (for example recently graded areas). Regular watering would ensure that the soil is moist to achieve 50% control of dust emissions from scrapers, graders and dozers. • Appropriately cover loads on trucks transporting material to and from the construction site. Securely fix tailgates of road transport trucks before loading and immediately after unloading. • Prevent, where possible, or remove, mud and dirt being tracked onto sealed road. • Apply water at a rate of >2 litres (L) per square metre per hour (L/m²/hr) to internal unsealed access roadways and work areas. Application rates would be related to atmospheric conditions (e.g. prolonged dry periods) and the 	M	Construction for each stage of development	Y	Y	Y

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	intensity of construction operations. Paved roads should be regularly swept and watered when necessary.					
10I	Where reasonable and feasible, dust generating activities (particularly clearing and excavating) would be avoided or minimised during dry and windy conditions.	M	Construction for each stage of development	Y	Y	Y
10J	Project site speed limits of 20 km/h would be imposed on all construction vehicles travelling within the Project site.	M	Construction for each stage of development	Y	Y	Y
10K	Graders would be limited to a speed of 8 km/h to reduce potential dust emissions.	M	Construction for each stage of development	Y	Y	Y
10L	Material stockpiles would not exceed an area of 1 ha and would be regularly watered to achieve 50% control of potential dust emissions.	M	Construction for each stage of development	Y	Y	Y
10M	Exposed areas and stockpiles would be limited in area and duration. For example, vegetation stripping or grading would be staged where possible, unconsolidated stockpiles would be covered, or hydro mulch or other revegetation applicant applied to stockpiles or surfaces left standing for extended periods.	M	Construction for each stage of development	Y	Y	Y
10N	Revegetation or rehabilitation activities would proceed once construction activities were completed within a disturbed area.	M	Construction for each stage of development	Y	Y	Y
10O	Construction plant and equipment would be well maintained and regularly serviced so that vehicular emissions remain within relevant air quality guidelines and standards.	M	Construction for each stage of development	Y	Y	Y
10P	Excavation works in potentially contaminated soils should be managed to ensure that they are completed during optimal dispersive conditions to minimise odorous emissions.	M	Construction for each stage of development	Y	Y	Y
10Q	Emissions from trucks would be regulated in accordance with the requirements prescribed in the National Environmental Protection	M	Construction for each stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	IMT site	Applicability	
					Southern Rail Access	Warehousing
	Measure (NEPM) (Diesel Vehicle Emissions) (NEPC 2001) or suitably relevant standards.					
10R	All construction vehicles would be tuned to avoid releasing excessive smoke from the exhaust and would be compliant with OEH Smokey Vehicles Program under the NSW Protection of the Environment and Operations Act 1997 (POEO Act) and POEO Regulations (NSW) (2010).	M	Construction for each stage of development	Y	Y	Y
10S	All on-road trucks are to comply with the Euro V emission standards or suitably relevant standards.	M	Construction for each stage of development	Y	Y	Y
10T	All new off-road construction equipment would be required to meet, at minimum, the US Environmental Protection Agency (EPA) Tier 3 emission standards (or suitably relevant standards) for non- road diesel engines.	M	Construction for each stage of development	Y	Y	Y
10U	Establishment of Action Response Levels (ARLs) for use with real-time dust management. These aid in the assessment of impact potential, and establish an early warning system during adverse trends, reducing complaint potential and non-compliance issues. An ARL trigger would be a defined measurement of elevated dust levels for a prolonged period.	M	Construction for each stage of development	Y	Y	Y
Air Quality – Operation						
10V	An air quality management plan (AQMP) (or equivalent) would be prepared for the operation of the Project.	M	Pre-operation for each stage of development	Y	Y	Y
10W	Manage Project site traffic to minimise the possibility of trucks queueing along public roads adjacent to the Project site. This can be achieved through the implementation and enforcement of an idling limit for trucks on site and provision for a troubled truck parking area.	M	Operation for each stage of development	Y	N	Y
10X	Investigate the possibility of reducing locomotives' idling times on site.	SR	Pre-operation for each stage of development	Y	N	N

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
10Y	Optimise the use of trucks capable of transporting multiple TEU containers simultaneously to achieve maximum efficiency onsite and reduce air emissions.	M	Operation for each stage of development	Y	N	N
10Z	Vehicles would be maintained to not release excessive levels of smoke from the exhaust and to be compliant with OEH's Smokey Vehicles Program under the <i>POEO Act</i> and POEO Regulations.	M	Operation for each stage of development	Y	N	Y
10AA	Emissions from the operators' trucks would be regulated by the NEPM (Diesel Vehicle Emissions) (NEPC 2001).	M	Operation for each stage of development	Y	N	N
10AB	Emissions from locomotives would follow international standards, such as those provided for under United States legislation 'Final Rule: Control of Emissions of Air Pollution from Locomotives and Marine Compression-Ignition Engines Less Than 30 Litres per Cylinder' (US EPA 2012) and should meet the Tier 2+ or above emission standard for all new locomotives entering the Project site (No emission standards are available under the NSW or Federal legislative framework for locomotives).	SR	Operation for each stage of development	Y	Y	N
10AC	Emissions from shunting engines would follow international standards, such as those provided for under United States legislation 'Final Rule: Control of Emissions of Air Pollution from Locomotives and Marine Compression-Ignition Engines Less Than 30 Litres per Cylinder' (US EPA 2012) and should meet the Tier 2+ or above emission standard. Older locomotives should be upgraded to meet Tier 1 or Tier 2+ emission standards where reasonable and feasible. (No emission standards are available under the NSW or Federal legislative framework for shunting engines).	SR	Operation for each stage of development	Y	Y	N
Cleaner fuel technology						
10AD	During detailed design the following measures would be further investigated: <ul style="list-style-type: none"> electrically powered refrigerated on site containers; 	SR	Detailed Design	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> • site only cars to be hybrid (electric/liquefied natural gas (LNG)/compressed natural gas (CNG), liquefied petroleum gas (LPG)); • older diesel trucks be installed with the latest emission reduction technology, where allowed (e.g. retrofitting of particle filters, installation of catalytic convertors or replacement with newer, less polluting diesel engines to ensure emissions requirements conform to the Australian Design Rule ADR80/03); • requiring all on-road trucks to comply with the Euro V emission standards; • all new off-road construction equipment to meet, at minimum, the US EPA Tier 3 emission standards for non-road diesel engines (US EPA Tier 4 emission standard equipment should be adopted where available); • use of hybrid locomotives or cleaner fuels for locomotives (e.g. locomotives powered by batteries with a small diesel engine for recharging the batteries and for additional power (as currently used on the Burlington Northern Santa Fe railway, California, USA)); and • use of fuel cells, LNG and electric powered locomotives. 					

Strategic Planning and management

10AE	<p>The following proposals would be considered as part of an effective and integrated strategic management plan:</p> <ul style="list-style-type: none"> • investigation of the feasibility of increasing the proportion of container traffic that moves by rail; • implementation of terminal appointment systems and appropriate time slots for Project site access for truck and rail deliveries to avoid unnecessary onsite air emissions during peak periods; • minimisation of the potential for fluctuating demand forecasts for equipment among carriers, railways and the terminal through effective communication; 	SR	Detailed design	Y	Y	N
-------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----	-----------------	---	---	---

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> • utilisation of the latest information technologies such as Intelligent Transportation Systems (ITS) applied to transportation operations which can result in improved transportation efficiency and a reduced environmental impact; and • use of a virtual container yard to assist with incorporating onsite operational efficiencies to ensure air emissions are minimised. 					
Miscellaneous						
10AF	<p>The following measures would be further investigated at detailed design stage:</p> <ul style="list-style-type: none"> • All chemicals and fuels would be stored in sealed containers as per appropriate regulations and guidelines. • The onsite storage of fuel would be kept to a minimum to minimise vapour emission levels. • Unloading of fuels (diesel or liquefied natural gas) would be vented via return hoses that recirculate vapours from delivery to receiver. • Tanks would be fitted with a conservation vent (to prevent air inflow and vapour escape until a pre-set vacuum or pressure develops). • Strategies would be put in place to reduce the usage of chemical and fuels in addition to using alternative fuel technologies as recommended in the NSW Action for Air (DECCW 2009). Particular focus would be on those products with the potential to release high levels of air toxics. 	SR	Detailed design	Y	N	Y
Odour						

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
10AG	<p>Odour emissions would be controlled through the implementation of best management practice (BMP). The following mitigation measures and safeguards are recommended for the operational works:</p> <ul style="list-style-type: none"> • providing covering for inlet works; • extraction of inlet works foul air gases to a soil bed filter for treatment; and • contingencies in place for potential loss of aeration (backup generator for power supply and storage of lime for dosing to the process units in the event that anaerobic conditions occur). 	<p>M (Implementation of BMP)</p> <p>SR (mitigation measures and safeguards)</p>	Detailed design and operation for each stage of development	Y	Y	Y
Future Monitoring						
10AH	<p>It is also proposed that ambient air quality monitoring be undertaken as part of the Project's construction phase right through to operation. This would include:</p> <ul style="list-style-type: none"> • onsite monthly dust deposition monitoring during construction to measure dust fallout from the Project at boundary points and selected sensitive receiver locations. This would include comparison of concentrations with the air quality criteria; and • annualised average monitoring after operations commence to ensure that the ambient air quality criteria are met. 	M	Construction and Operation for each stage of development	Y	Y	Y
Greenhouse Gases						
11A	Where possible, establish and maintain areas of native flora and vegetation within the Project site to generate significant carbon sequestration benefits.	M	Construction and operation for each stage of development	Y	N	
11B	Where possible, implement the use of biofuels (e.g. biodiesel, ethanol, or blends such as E10 and B880) to reduce GHG emissions from plant and equipment.	SR	Construction and operation for each stage of development	Y	N	Y

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
11C	Consider the use of vehicles with minimum GHG emissions ratings of 7.5 for passenger vehicles and 6 for light commercial vehicles, as described in the Green Vehicle Guide (http://www.greenvehicleguide.gov.au/GVGPublicUI/home.aspx).	SR	Construction and operation for each stage of development	Y	N	Y
11D	Energy-efficient guidelines for operational work, such as minimal idling time for machinery or complete shut off, would be considered and implemented where appropriate.	SR	Operation for each stage of development	Y	N	Y
11E	Establish an Environmental Management System (EMS) that involves regular monitoring, auditing and reporting on energy, resource use and GHG emissions from all relevant activities; include energy audits with a view to progressively improving energy efficiency and investigation of renewable energy sources (e.g. onsite solar generation), where feasible.	M	Operation for each stage of development	Y	Y	Y
11F	Investigate methods to reduce losses from industrial processes (refrigerants and SF6).	M	Operation for each stage of development	Y	N	Y
11G	Investigate and, where possible, implement key performance indicators (KPIs) for plant efficiency and GHG intensity.	M	Operation for each stage of development	Y	N	Y
11H	Consider and implement, where possible, the mitigation options for further reducing energy and GHG emissions detailed in Table 9.4 in Section 9 – Project sustainability.	SR	Detailed design, construction and operation for each stage of development	Y	Y	Y
Aboriginal Heritage						
12A	Where reasonable and feasible, options would be explored to conserve moderate to high significance sites in situ.	SR	Detailed design and Early Works	Y	Y	Y
12B	An Aboriginal heritage interpretation strategy for the Project would be developed in close consultation with the registered Aboriginal parties.	M	Detailed design and Early Works	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
12C	<p>Options for managing impacts at sites MA6 and MA7 would be explored during the detailed design phase in consultation with registered Aboriginal parties (RAP). If the scars are considered to be of Aboriginal origin, possible management options include:</p> <ul style="list-style-type: none"> • Conservation of the tree(s) in situ. This would involve designing the project to ensure that the tree(s) would not be impacted. • Salvage and conservation of the tree(s), or the scarred portion of the tree's trunk, at a location outside the project area. <p>In the event there is not a consensus of views among all of the RAPs, it is recommended that a precautionary approach be taken. This would involve acting upon statements of the tree(s) holding cultural value, even if only a minority of RAPs view either or both trees as holding cultural value.</p>	SR	Detailed design and Early Works	Y	N	Y
12D	<p>An archaeological salvage excavation program would be implemented to preserve archaeological deposits of moderate to high archaeological/scientific significance located within the construction footprint (items recorded at MA5 and MA9).</p> <p>Consideration would be given to conserving both sites in situ, within open space reserves, or as an extension of the proposed conservation zone</p>	<p>M (salvage program)</p> <p>SR (details of conservation)</p>	Detailed design and Early Works	Y	N	Y
12E	A surface salvage program would be carried out to conserve surface artefacts located within the construction footprint (items recorded at MA1, MA2, MA3 and MA4). Salvage of surface artefacts would be undertaken before any impacts in these areas.	M	Detailed design and Early Works	Y	N	Y
12F	The Unanticipated Discoveries Protocol described in Appendix 10 of Technical Paper 10 – Aboriginal Heritage Impact Assessment in Volume 7 of the EIS, would be followed in the event that historical items or relics or suspected burials are encountered during construction works.	M	Construction of each stage of development	Y	Y	Y
12G	Consultation would be ongoing with the registered Aboriginal parties during construction of the Project and would include:	M	Construction of each stage of development	Y	Y	Y

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> consultation on the future care and management of recovered Aboriginal objects; methodologies for any future investigations; and finalisation of management and mitigation strategies subject to detailed design. 					
European Heritage						
13A	Road names within the School of Military Engineering (SME) would be retained where possible.	SR	Detailed design	Y	N	Y
13B	Continued commemoration of significant events and individuals would be considered through the naming of buildings, streets and the rail bridge proposed for construction as part of the Project.	SR	Detailed design	Y	Y	Y
13C	Where reasonable and feasible options exist for avoiding impacts on one or more identified heritage items, preference would be given to conserving items of Commonwealth or State significance.	M	Detailed design	Y	Y	Y
13D	Where avoidance of impacts on a heritage item is not reasonable or feasible, mitigation works inclusive of archival recordings, salvage of archaeological deposits, relocation of significant elements of the built environment and/or adaptive reuse would be undertaken.	M	Early Works	Y	Y	Y
13E	A European heritage interpretation strategy would be developed in close consultation with local historical societies, former and current staff and military personnel.	M	Early Works	Y	Y	Y
13F	No impacts would occur within the potential archaeological deposits (PAD) boundaries of Moorebank Historical Potential Archaeological Deposit (MHPAD) 1 and MHPAD2 without prior archaeological salvage, as these sites contain archaeological deposits, inclusive of in-situ building remains, that are assessed to be of local significance in the context of the history of military housing and training at Moorebank.	M	Early Works	Y	N	Y
13G	In addition to archival recording of the Transport Compound Workshop (B99), consideration would be given during the detailed	SR	Early Works	Y	N	N

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	design stage to the in-situ conservation or adaptive reuse of this structure within the Project site. This would assist with mitigation of heritage impacts on the structure itself and the Moorebank Cultural Landscape as a whole.					
13H	In addition to archival recording, the Dog Cemetery (MH1) would be repositioned and the individual graves reinterred. This would be carried out in accordance with the wishes of the SME's Explosive Detection Dogs unit and respecting the social value of the site.	SR	Early Works	Y	N	Y
13I	In addition to archival recording, consideration would be given during detailed design to the in-situ conservation of the Commemorative Garden (MH6). If in situ conservation is not possible, the plaques and planting should be relocated to an alternative location on public display within the Project.	SR	Early Works	Y	N	Y
13J	For the southern rail access, heritage item Railway viaduct, Main Southern Railway Line (Item 12) should be noted on all plans and maps during construction and all care taken to avoid this item.	SR	Detailed design and construction for each stage of development	N	Y	N
13K	The Unanticipated Discoveries Protocol (detailed in Appendix 7 of Technical Paper 11 – European Heritage Impact Assessment in Volume 8) would be followed in the event that historical items or relics or suspected burials are encountered during excavation works.	M	Early Works and construction for each stage of development	Y	Y	Y
13L	The Unanticipated Discoveries Protocol (detailed in Appendix 7 of Technical Paper 11 – European Heritage Impact Assessment in Volume 8) would be followed in the event that historical maritime items or relics are encountered during bridge works within the Georges River.	M	Early Works and construction for each stage of development	N	Y	N
13M	Further consideration would be given to options for the retention and/or relocation and adaptive reuse of the CUST Hut and the RAAF STRARCH Hangar to mitigate impacts on heritage values associated with these structures and to broaden their cultural landscape. Options considered for mitigation in order of preference are: <ul style="list-style-type: none"> Relocation (either offsite or onsite) and conserve/adaptive reuse – this would be investigated further as part of the detailed design and any future development applications. 	SR	Detailed design and Early Works	Y	N	Y

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> Interpretive commemoration utilising materials/elements from the building this may be required but would be determined by the findings from investigations in option 1 above. Demolition may be required but would be determined by the findings from investigations in option 1 above. <p>The first preference would be to retain and adaptively re-use these items on the redeveloped Project site (within the precinct but outside the secure area, as part of the administrative facilities or similar). If this is not feasible or practicable, the second preference would be for relocation to another appropriate location, potentially with adaptive reuse.</p>					
Visual and urban design						
14A	<p>Visual mitigation measures to be considered during the detailed design of the Project include:</p> <ul style="list-style-type: none"> avoiding clearing of the conservation area which currently obscures and filters views into the Project site; enhancing existing native vegetation adjoining the Georges River; enhancing existing native trees with extended and consolidated planting; and conserve the natural character and streetscape along Moorebank Avenue and allow for effective landscaping. 	SR	Detailed design	Y	Y	Y
14B	<p>The following additional visual mitigation measures would be considered during detailed design:</p> <ul style="list-style-type: none"> Consider the siting of development to minimise vegetation clearing. Consider options for permeable tree planting adjoining buildings to reduce visual impacts and to cast shadows. Enhance vegetation adjoining water bodies. 	SR	Detailed design	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	<ul style="list-style-type: none"> • Maximise integration of the terminal facilities and the associated warehousing precinct by providing vegetation screening, way-finding throughout the Project site, breakout space for the public and staff, and visual relief. • Provide additional native trees to the car park areas to maximise the opportunity for shade and to provide a landscape frontage that is scaled to complement the new buildings. • Provide landscaping along Moorebank Avenue, including extensive tree and shrub planting on road frontages that provides visual relief from the industrial appearance of the warehousing, with a layered approach along the streetscape. • Consider localised earth mounding and native canopy tree planting to internal landscape areas on the western side of the new buildings to mitigate visual impacts on residential areas. • Choose finishes and materials that limit contrast with the surrounding landscape, with the preferred use of muted colours. • Take opportunities to start early rehabilitation and supplementary planting of endemic species to the conservation area on the western boundary. • Consider options for tree planting adjacent to buildings, to reduce visual impacts (while also considering any required security constraints and rail line fell distances). • Consider the building design further during the detailed design process and be consistent with controls outlined in the Liverpool Development Control Plan 2008, Part 7 Development in Industrial Areas (LCC 2008c), including facade treatment, materials, building design and lighting. 					

Light Spill

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
14C	Lighting required during construction of the Project would be designed and located to minimise the effects of light spill on surrounding sensitive receivers, including residential areas and the proposed conservation area.	M	Construction for each stage of development	Y	Y	Y
14D	Design lighting to minimise impacts on surrounding existing and future residents and the proposed conservation zone.	M	Detailed design	Y	N	Y
14E	Consider use of shields on luminaire lighting to minimise brightness effects.	SR	Detailed design	Y	Y	Y
14F	Select asymmetric light distribution-type floodlights as part of the proposed lighting design (which means the light is directed specifically to the task with minimal direct light spill to the surrounding area).	M	Detailed design	Y	N	Y
14G	Consider low reflection pavement surfaces to reduce brightness.	SR	Detailed design	Y	N	Y
14H	Minimise the quantity of light and energy consumption in parts of the Project site that are not active, while retaining safe operation.	M	Detailed design	Y	N	Y
Property and Infrastructure						
15A	Undertake further investigations into the location of existing utilities and the likely impact on these utilities. This would include consultation with asset owners to determine the appropriate measures for relocation.	M (undertake consultation and investigation) SR (details of measures)	Detailed design	Y	Y	Y
15B	Implement 'dial before you dig' protocols for all potential utilities affected by the Project.	M	Construction for each stage of development	Y	N	Y
Social and Economic Impacts						
16A	A Project contact phone number and website would be maintained during construction and operation to enable the community, including	M	Early Works and construction and	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
	local business owners and/or operators, to access information on the Project and receive responses to any concerns.		operation for each stage of development			
16B	A complaints line and resolution process would be set up and maintained.	M	Early Works, construction and operation for each stage of development	Y	Y	Y
Human health risks and impacts						
17A	Annualised average monitoring for air quality and noise would be regularly reviewed against the guidelines developed in the specialist studies supporting this EIS, as they are based on protecting the health of the community. Should exceedances be identified in these key indicators as a result of the Project, then a further and more targeted monitoring and management program would be developed as required.	M	Construction and operation for each stage of development	Y	Y	Y
Waste management – Construction						
18A	A construction waste management plan (or equivalent) would be prepared as part of the overall CEMP. This would implement key principles of relevant waste guidelines, and the waste management hierarchy of reduction, reuse, recycling and recovery.	M	Construction for each stage of development	Y	Y	Y
18B	The waste hierarchy would be investigated and implemented where possible with avoidance of waste, re-use and recycling incorporated into construction methodologies.	SR	Construction for each stage of development	Y	Y	Y
18C	Consideration would be given to the selection of materials for use in construction to minimise waste generated throughout their lifecycle.	SR	Construction for each stage of development	Y	Y	Y
18D	Where practicable, construction materials that contain minimal embodied energy would be preferred.	SR	Construction for each stage of development	Y	Y	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
18E	Opportunities would be explored where practicable to recycle or re-use materials arising from demolition works, with a preference for onsite re-use where possible (or recycling through an appropriate recycling contractor).	SR	Construction for each stage of development	Y	Y	Y
18F	Where possible, site disturbance and unnecessary excavation would be minimised.	SR	Construction for each stage of development	Y	Y	Y
18G	Formwork would be re-used where possible.	SR	Construction for each stage of development	Y	Y	Y
18H	Sewage waste would be disposed of by a licensed waste contractor in accordance with Sydney Water and OEH requirements.	M	Construction for each stage of development	Y	Y	Y
Waste Management – Operational waste						
18I	A waste management plan (or equivalent) would be prepared and implemented to govern the overall use of materials, categorisation of wastes, and re-use and recycling process.	M	Operation for each stage of development	Y	Y	Y
18J	The waste hierarchy would be investigated and implemented where possible with avoidance of waste, re-use and recycling incorporated into the design, purchasing and procurement.	SR	Operation for each stage of development	Y	N	Y
18K	Consideration would be given to the selection of materials for use in operation to minimise waste generated throughout their lifecycle.	SR	Operation for each stage of development	Y	N	Y
18L	Materials used onsite would be recycled where possible, including steel, batteries, electronics and paper.	SR	Operation for each stage of development	Y	N	Y
18M	Future recovery of waste would be encouraged through site design, including provision for storage areas and appropriate paths for waste containers.	SR	Operation for each stage of development	Y	N	Y

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
18N	Dedicated recycling storage areas and recycling bins would be located throughout the Project site, with clear signage and convenient access for waste recycling service providers. This would include bins for paper, plastics, glass, metals and compost.	SR	Operation for each stage of development	Y	N	Y
18O	Where required, separate bunded storage area would be established for liquid wastes (e.g. oils), along with drainage to grease trap if required.	SR	Operation for each stage of development	Y	N	Y
18P	A waste management system would be developed to include calculations of anticipated waste volumes from the office, landscaped areas, refuelling facilities and warehousing and distribution activities for ongoing comparison and monitoring.	SR	Operation for each stage of development	Y	N	Y
18Q	Onsite waste management infrastructure would, as a minimum, cater for the following three waste streams: recovered waste (for re-use or recycling); residual waste (for disposal or alternative waste technology); and hazardous waste (wastes that are toxic, corrosive, flammable, explosive or reactive).	SR	Operation for each stage of development	Y	N	Y
18R	Water efficient fixtures and fittings would be installed wherever possible, including in all basins, wash down areas and offices and general amenities areas.	SR	Operation for each stage of development	Y	N	Y
18S	Where possible, rainwater harvesting and surface water runoff management would be utilised for watering of gardens and landscaping.	SR	Operation for each stage of development	Y	N	Y
18T	The use of grey water and black water recycling would be investigated. Recycling water would most likely be used for toilet flushing and/or landscape irrigation. If used, it would comply with the relevant guidelines and agency approval.	SR	Operation for each stage of development	Y	N	Y
18U	Where possible, fire test water from the Project site would be collected for re-use. Washdown water from vehicle and train washdown facilities (if required) would also be collected for re-use.	SR	Operation for each stage of development	Y	N	Y

Moorebank Precinct West Concept Modification Supplementary Response to Submissions Report

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	Applicability		
				IMT site	Southern Rail Access	Warehousing
18V	Where reasonable and feasible, water meters would be installed on all major water uses (air conditioning cooling towers, irrigation, domestic hot water, amenities, washdown, rainwater collection and recycled water system).	SR	Operation for each stage of development	Y	N	Y
18W	Water reduction targets would be considered for office areas, in line with the National Australian Built Environment Rating System (NABERS) Water protocol for office buildings (refer discussion in Section 9 – Project sustainability).	SR	Operation for each stage of development	Y	N	Y
Use of resources						
18X	Opportunities to utilise recycled building materials in the overall structure of the Project would be explored. Development of the design would seek to use construction materials that have been made with a post-consumer recycled content of 50% or greater.	SR	Detailed design and operation for each stage of development	Y	Y	Y
18Y	Measures to minimise the use of energy and fuel would be investigated and implemented where appropriate. These may include using non-renewable sources such as petroleum, diesel, natural gas and liquefied natural gas.	SR	Detailed design and construction for each stage of development	Y	Y	Y
18Z	Where practicable, water would be re-used onsite, including water stored in sediment basins.	SR	Detailed design and construction for each stage of development	Y	Y	Y
Use of resources – operation						
18AA	Initiatives in Table 9.4 in Section 9 – Project sustainability of MPW Concept EIS would be considered and implemented where practicable to minimise the use of energy and fuel during the operation of the Project.	SR	Detailed design and operation of each stage of development	Y	Y	Y
Cumulative Traffic impacts						

REMM	Mitigation Measure	Mandatory (M) / Subject to review (SR)	Implementation Phase	IMT site	Applicability	
					Southern Rail Access	Warehousing
19A	The intersection treatments and delivery timing for all cumulative scenarios are presented in Table 7.37 of the Response to Submission report; a number of these treatments would be required for a Moorebank project only scenario by 2030.	SR	Detailed design and operation of each stage of development	Y	N	N
Cumulative Air and Noise						
19B	The design and implementation of air quality and noise mitigation would need to be determined for the final staged operations during the detailed design phase and, as required, be included in the environmental assessment for the Stage 2 SSD approval(s).	SR	Detailed design and operation for each development stage	Y	N	Y

7 CONCLUSION

SIMTA are seeking approval for the modification of the Moorebank Precinct West (MPW) Project (the Modification Proposal), as modified, under the MPW Concept Approval (SSD 5066).

A modification application was prepared for the Modification Proposal, pursuant to Section 96(2) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to amend the MPW Project. A Modification Report (Arcadis, June 2016) was prepared in consideration of further civil and earthworks and design development to seek approval for additional site preparatory works, including the import, placement and stockpiling of clean fill, as a modification to the approved MPW Early Works (i.e. Stage 1 of the MPW Project).

The Modification Proposal (presented within the Modification Report) was publicly exhibited in accordance with clause 83 of the *Environmental Planning and Assessment Regulation 2000* between 7 July 2016 and 22 August 2016.

Subsequent to the exhibition of the MPW Concept Modification Report, SIMTA reconsidered the timing and need for the additional site preparatory works to be undertaken during the MPW Early Works. As a result, the Modification Proposal was amended (thereby known as the Amended Modification Proposal) and presented within the MPW Concept Modification Response to Submissions Report (MPW Concept Modification RtS) (Arcadis, December 2016). The Amended Modification Proposal seeks to modify the MPW Concept Approval primarily to enable the importation of 1,600,000m³ of clean general fill material. The physical importation of fill would now be undertaken as part of the MPW Stage 2 Proposal (i.e. Stage 2 of the MPW Project) and subject to separate approval, rather than during the MPW Early Works. The Amended Modification Proposal also includes a number of other minor modifications to facilitate the future stages of development for the MPW Project, as detailed in the Modification Report.

The MPW Concept Modification RtS for the Amended Modification Proposal was prepared to satisfy the provisions of Section 89G of the EP&A Act and Clause 85A of the EP&A Regulation, and publicly exhibited between 14 December 2016 and 24 February 2017. During this period, a total of 194 submissions were received from the community, including landowners, occupants and community interest groups. Seven submissions were received by Government stakeholders.

The purpose of this Supplementary Response to Submissions (SRtS) is to respond to submissions provided by both community and government stakeholders during the exhibition of the RtS (for the Amended Modification Proposal). This SRtS has been prepared to satisfy the provisions of Section 89G of the EP&A Act and Clause 85A(2) of the EP&A Regulation. Each of the submissions received has been collated, analysed and addressed as relevant.

No further amendments to the MPW Concept Modification are proposed within this SRtS in addition to those presented within the MPW Concept Modification RtS (i.e. the Amended Modification Proposal within this SRtS remains unchanged from that presented in the MPW Concept RtS).

7.1 Overview of submissions and consultation

During the public exhibition period of the MPW Concept Modification RtS, submissions were invited from all stakeholders including members of the community and government stakeholders. A total of 194 public submissions have been received from the community, landowners and special interest groups. A total of eight submissions have also been received from government agencies.

It should be noted, as demonstrated within Sections 3 and 5 of this SRtS, that a large number of community submissions received were not directly relevant to the scope of the Amended Modification Proposal, but rather were submitted in relation to the overall MPW Project in general, i.e. related to the MPW Concept Approval (SSD 5066) and aspects of the Moorebank Precinct (MPE Stage 2 Proposal (EIS, Arcadis, December 2016) and MPE Concept Plan Modification Proposal (Modification Report, Arcadis November 2016).

The key issues which have been raised by the community for the Amended Modification Proposal, include:

- Traffic and transport (79 submissions)
- Community (58 submissions)
- Natural environment (55 submissions)
- Planning process (42 submissions)
- Noise impacts (40 submissions)
- Human health (34 submissions)
- Economics (23 submissions).

Government agencies raised similar concerns to that provided by the community. Other submissions identified they had no further issues and that they felt the MPW Concept Modification RtS addressed their comments (i.e. Department of Industry, Heritage Council).

These submissions were collated, analysed and included within this SRtS (refer to Section 4 and 5 of this SRtS).

This SRtS includes consideration of all comments raised and provides additional information, where necessary, to respond to and close out concerns raised by all stakeholders. Further, where necessary and suitable, the mitigation measures (previously provided within Section 8 of the MPW Concept Modification RtS) have been updated and included within this SRtS (refer to Section 6 of this SRtS).

7.2 Amendments to the Proposal

The Amended Modification Proposal, as detailed and assessed in the MPW Concept Modification RtS, included the following components:

- Altered construction footprint
- Clean general fill importation
- Interaction between the MPW and MPE sites
- Changes to approved function and re-arrangement of approved uses
- Maximum building heights
- Staging of future applications
- Subdivision.

Overall, the MPW Concept Modification RtS concluded that the Amended Modification Proposal would not result in any substantial environmental impacts, and these potential impacts can be adequately managed through the implementation of the Minister's Conditions of Approval (MCoA), the Revised Environmental Management Measures (REMMs) provided within the MPW Concept Approval and additional mitigation measures identified in Section 7 of the MPW Concept Modification RtS.

The Amended Modification Proposal proposes a development which is 'substantially the same' as that provided within the MPW Concept Approval in that it would facilitate

the development of an intermodal terminal facility with the same IMT throughput limitations, warehousing GFA, freight village, truck parking and other ancillary development as provided within the MPW Concept Approval. On this basis, the Amended Modification Proposal is considered substantially the same development and can be considered for approval under s96(2) of the EP&A Act.

As noted above, no further amendments to the MPW Concept Modification are proposed within this SRtS in addition to those presented within the MPW Concept Modification RtS (i.e. the Amended Modification Proposal within this SRtS remains unchanged from that presented in the MPW Concept Modification RtS). Therefore, no additional environmental assessment has been undertaken.

7.3 Next steps

The DP&E will, on behalf of the NSW Minister for Planning, review the Modification Report, the MPW Concept Modification RtS and this SRtS. Once the DP&E has completed its assessment, a draft assessment report will be prepared for the Secretary of the DP&E, which may include recommended conditions of approval.

The assessment report will then be provided to the Planning Assessment Commission (PAC) for consideration. The PAC would determine the Amended Modification Proposal, with any conditions considered appropriate.

The PAC's determination, including any conditions of approval and the Secretary's report, will be published on the DP&E's website immediately after determination, together with a copy of this SRtS.

SIMTA is committed to continuing to consult with stakeholders, including the community throughout the planning of the MPW Project, including the Amended Modification Proposal, and future stages of development. Further information is available on the Project website: www.simta.com.au.

Moorebank Precinct West - Concept Modification

Supplementary Response to Submissions -
SSD 5066 MOD1

Appendix A - Community Response Table



SIMTA

SYDNEY INTERMODAL TERMINAL ALLIANCE

Part 4, Division 4.1, State Significant
Development

Table 2 Community Response Table

Aspect	Issue	Summary	Respondent Reference number	Total
Traffic	Congestion / Capacity	<ul style="list-style-type: none"> Concerned that Moorebank and Moorebank Avenue in particular is inadequate for large container trucks and is already congested 		
		<ul style="list-style-type: none"> Concerns that support vehicles and trucks from the Proposal would create congestion on the surrounding road network 		
		<ul style="list-style-type: none"> Concerns that the Proposal would result in congestion in nearby suburbs including Moorebank, Chipping Norton, Casula, Liverpool and the Prestons 	20,60\192699,102,108,142\184117,159\189971,4,9,14,17,34\184169,36\191332,53,55,68,79,80,83,88,91\184107,94,95\191382,116,118\181033,126,127,128,134,138,151,174\184165,175\184159,176\184113,198,186482,5,18\191470,40,172,191,46,67,161,136,184348,35,77,106,192,23,43\184155,51,61,131\184161,39,103,19\189823	57
		<ul style="list-style-type: none"> Extra traffic congestion will cause strain on local recourses including shops and travel times 		
		<ul style="list-style-type: none"> Concern that the Proposal would add to existing traffic congestion on roads in the vicinity of the project. Specifically, M5, M7, Newbridge Rd, Heathcote Road and the Hume Highway, especially heavy vehicles. Concerned also by fill increasing the impact of previously mentioned issues 		
		<ul style="list-style-type: none"> The Local community cannot handle the increased number of trucks and congestion 		

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> • New suburbs have been established nearby and already the traffic is horrendous • Roads cannot support current levels of traffic let alone the increases that this project will bring • The road system can't cope with the extra 2,500 trucks per day and 104 per hour on Moorebank Avenue plus current local congestion • Proposal would add to increasing road congestion created by upcoming apartment developments and from general population growth in the area • Congestion from the movement of fill to site, which would potentially put children in schools at risk due to increased traffic • No adequate attempt has been made to deal with the 10,000 trucks per day the site will generate • What impact will stormwater and road works have on traffic in the local area • Importation of 2.2 million cubic meters of fill will require trucks to be on the roads 24 hours a day • Road reconfiguration will not remove the problems associated with increased traffic 		

Aspect	Issue	Summary	Respondent Reference number	Total
	Assessment	<ul style="list-style-type: none"> Outdated and inaccurate traffic projections put forward by the Intermodal are a key problem of all applications. 	38,39,53,185634,9,55,184348,186234	8
		<ul style="list-style-type: none"> 450,000 additional truck movements for fill has not been studied nor "considered for mitigation" and will worsen traffic congestion DP&E should start again with the precinct plan and EIS in light of these new applications SIMTA has given no meaningful response to DP&E and PAC for preparing a plan to accommodate additional traffic from the Proposal It is improper for this modification application to be assessed before the NSW transport planning reports due to be released as per the 2016/17 Budget Estimates Hearing of the NSW Government which state "The NSW Government has committed \$3.4 million to progress studies into road infrastructure options to manage traffic impacts from the proposed Moorebank Intermodal Terminal and forecast growth in the broader Liverpool and Moorebank area." Traffic mitigation measures do not take into account the critical congestion point 		

Aspect	Issue	Summary	Respondent Reference number	Total
		<p>of a 1km section of the M5 between Moorebank Avenue and the Hume Highway called the Georges River Bridge</p> <ul style="list-style-type: none"> The Traffic Impact Assessment Report prepared by Arcadis is extremely vague lacking in substantial evidence and depth to show how exactly do they tend to mitigate both noise and traffic both in and outside peak periods. Why is there no mention of the impact of traffic to Casula/ Liverpool Links who are adversely affected? Please show evidence that shows otherwise. 		
	Safety	<ul style="list-style-type: none"> Increase in traffic, particularly heavy vehicles, potentially causing an increase in traffic accidents Any traffic increase in this area will "overwhelm" residents and normal users of the road Safety of heavy vehicles using local roads 	19\189823,195763,41,183	4
	Road Infrastructure	<ul style="list-style-type: none"> Damage to roads from increases in heavy vehicle numbers Existing road infrastructure is not adequate to support the project 	43\184155,129\189667,148,168\184179,4,5,9,1972 18,20,128,138,73,55,178938	14

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> Moorebank Avenue would need to be widened to at least 3 lanes each way for project to be feasible Construction of a temporary diversion road to allow diversion along Moorebank avenue will cause traffic chaos Transport links are already struggling with current numbers Early works for fill importation will begin before road upgrades will be complete, significantly impacting traffic and invalidating early modelling Plans do not consider Cambridge Avenue not its redevelopment, it is a major arterial road. Thus the plan is flawed for not considering it 		
	Use of local roads	<ul style="list-style-type: none"> Commuter vehicles utilising back roads to avoid congestion Increase in traffic on surrounding local roads Heavy vehicles getting in accidents on local roads and endangering houses and pedestrians 	41,132	2
Noise	Construction noise	<ul style="list-style-type: none"> Concerns around noise impacts generated by construction plant and equipment with 24/7 construction. 	68,118\181033	2

Aspect	Issue	Summary	Respondent Reference number	Total
	Operational noise	<ul style="list-style-type: none"> Noise from the construction and operation of 300,000m2 of warehousing and distribution facilities of the Proposal will negatively affect residents The continuous transfer of containers between the MPE stage 1 IMT and the Proposals warehousing and distribution facilities will require heavy vehicles capable of being loaded with containers and used on MPE stage 2 site will cause 24/7 noise. 	128,138	2
	General	<ul style="list-style-type: none"> The proposal will increase noise pollution, specifically 24 hour operations, impacting the health of residents The Proposal will result in noise impacts to residents in what are now considered quiet neighbourhoods General comment around noise generated by plant and operational machinery including trucks, container terminal, loading docks etc Concerned importation of fill will negatively impact community and will cause dust and noise pollution Concerned for the noise impacts on residential homes 	17,68,85\184177,151,197218,15,184348,142\184117,195763,23,51,14,112\192752,46,97\192744,128,138	17

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> The increase in site level from greater quantities of fill will result in greater impacts from generation, transmissions and reception of construction and operational noise Objects to the noise that will be generated by the extra traffic on Moorebank Avenue Dispute the reports showing the project will have no noise impacts on residents 		
	Assessment	<ul style="list-style-type: none"> The estimated noise levels noted in the assessment as being acceptable are contradicted by Transport for NSW and Sydney Trains Noise logging reports of 2015 Noise monitoring is to be reviewed by the secretary of the PAC after 5 years. This seems too infrequent. 	146,152,31	3
	Mitigation	<ul style="list-style-type: none"> A construction noise and vibration management plan needs to be prepared for the Proposal What mitigation will be provided to the people of Casula and Moorebank located 300 meters from the area of impact? Put in the barriers to protect the people from noise. 	68,186234	2

Aspect	Issue	Summary	Respondent Reference number	Total
Air	Air quality / pollution	<ul style="list-style-type: none"> • Increase in pollution generated by increased congestion and heavy vehicle movements • Concerns that additional heavy vehicles and trains from the Proposal will result in increasing air pollution (in particular diesel emissions) impacting on nearby residents and the environment • The area and community cannot handle the pollution • The increase in diesel trucks will worsen air quality in an area close to schools, nursing homes, retail and a large residential population in an area that is already over polluted and over populated • Please explain in further detail the "very low impacts on the surrounding environment from air pollutants", Table 5 & 6 of the PB EIS dated 20/04/2016 has an annualised emissions quantification which does not appear to be "very low" • How will the proposal increase health risks for populations residing adjacent to source points of Diesel Fuel emissions. • Diesel Fumes will be increased as a result of the Proposal 	23,68,88,95\191382,97\192744,112\192752,142\184117,154\189981,159\189971,35,77,106,184348,41,78,31,52,71,67,136,186234	21

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> Children and schools nearby will be impacted by increased pollution 		
Human health	Pollution / air quality	<ul style="list-style-type: none"> Concerns around emissions from vehicles, trucks and trains that are potentially carcinogenic Increased pollution will affect people's health particularly young children Impacts to air quality from the project would result in health impacts to nearby schools, childcare centres and homes Concerns around air pollution and particulates (including diesel particulate matter) from the project resulting in various impacts to health including: Shortened life expectancy, increases outbreaks of asthma, cancer in newborns, lung cancer in children, autoimmune diseases, bronchitis, coronary disease, cardiovascular disease Increased impacts to those suffering asthma and other respiratory conditions Concerned the proposal will increase pollution in the local area and affect the community Concerns to residents from increased pollution Area cannot handle increase in pollution 	159\189971,197218,2,10,68,195763,9,75\191524,3\184163,12\184105,81,109,165,168\184179,116,46,174\184165,192,51,175\184159,62,176\184113,198	23

Aspect	Issue	Summary	Respondent Reference number	Total
	Sleep disturbance	<ul style="list-style-type: none"> Sleep disturbance from the Proposal resulting in impacts to human health How will light pollution impact both human and animal habitats? What mitigation does MIC/ SIMTA propose to the Casula/Moorebank estate in relation to light? 	68,186234	2
	General	<ul style="list-style-type: none"> Concerned about the detrimental health effects of the project on a community predominantly made up of young families General impacts to health and wellbeing of nearby residents not considered in this proposal This project is causing stress for their family worrying about their home and the area they live in Please consider the health of our children in an already polluted environment Project will cause additional stress to residents with no immediate or long-term benefit Please consider the health of our children and grandchildren Potential release of fire-fighting foam products and other unmarked military 	30\184136,62,81,122,73,75\191524,86,1,6,118\181033,184348	11

Aspect	Issue	Summary	Respondent Reference number	Total
		pollution caches could impact workers and surrounding residents.		
	Effects of particulate matter	<ul style="list-style-type: none"> Impacts to health from PM2.5 in diesel fumes generated by truck and train movements 	9,14	2
Natural Environment	General Environment	<ul style="list-style-type: none"> The proposal would significantly impact the environment The environmental impact from the removal of vegetation, remediation works, earthworks and levelling of the site, drainage and utilities installation, construction of the hardstand. Adverse impacts to local wildlife Damage to the environment would be unrepairable Project will wipe out native wildlife particularly native birds such as parrots, cockatoos and kookaburras 66ha of bulk earthworks will be remediated with grass, this would leave it more susceptible to erosion and have a higher mobility potential than other vegetation types. Is there an intention to utilise geotechnical fabrics to minimise erosion? Overland runoff from this area and flooding from the site in general can affect estuary sunlight penetration and 	8\189911,63,134,186314,89,128,138,131\184161,142\184117,31,55,71	12

Aspect	Issue	Summary	Respondent Reference number	Total
		<p>can have greater impacts on the Georges river such as bank erosion, turbidity creation, poisoning of marine life etc.</p> <ul style="list-style-type: none"> The artificial gradient that will be created for run off given the intended extra elevation of the site. How will the added gradient affect surrounding vegetated areas? 		
	Impact on local river systems	<ul style="list-style-type: none"> Concerned the project will negatively impact South-West river systems Concerned the project will cause major degradation/damage to the Georges river Concerned the proposal will cause pollution to the local river systems Redirection of waterways will cause ANZAC and Harris creeks to dry up Objects to use of prime public riverfront for an industrial project and its alienation from public use Project should not be situated so close to an environmentally sensitive area such as the Georges River Area should be used to beautify Georges river rather than for industrial uses 	38,157,118\181033,122,126,127,159\189971,18\191470,47,100,64,89,146,152	14
	Aboriginal/European Heritage	<ul style="list-style-type: none"> The spur line proposal is across land that is currently occupied by Glenfield Waste 	55,184348	2

Aspect	Issue	Summary	Respondent Reference number	Total
		<p>Services and used as a waste landfill site, which so far has been used as an excuse to ignore visual impacts to Glenfield Farm, even though this landfill site is temporary and was to be</p> <ul style="list-style-type: none"> • remediated and returned to public use land, under the National Parks and Wildlife service control. This land remains an important part of the visual curtilage of Glenfield Farm. • Historic Glenfield farm buildings listed as being of exceptional importance to the state of NSW would have their views disrupted • The interest in the land currently occupied by Glenfield landfill is posed by Glenfield Farm to have had its visual curtilage completely ignored in this deal, which should now be exposed to proper public and planning scrutiny as part of the modification application process. Any voluntary agreement made in respect of this land should have included the interest in it held by Glenfield Farm's visual curtilage and the owners should have been consulted • The acoustic impacts will cause grave issues of liveability to Glenfield Farm along with ruining its horizon viewpoint 		

Aspect	Issue	Summary	Respondent Reference number	Total
	Bushfire	<ul style="list-style-type: none"> The southern aspect of the site will present a bushfire threat as it has sloped indexed land which under the right temperature and wind direction could pose a problem to residents who have to evacuate through 1 main entry/exit point on Wattle Grove road 	105	1
	Pollution	<ul style="list-style-type: none"> Increase in site level from the fill will result in great distribution of lighting impacts to local residents Increase in building heights will increase noise light and pollution to local residents 	116,139\189899	2
	Flooding	<ul style="list-style-type: none"> Increasing site level will increase flooding impacts to surrounding areas New concrete yards and large shed and general increase in sealed areas will displace rainwater and increase flood danger for surrounding residents and areas Proposal will change the whole nature of the flood zone and Georges River catchment, resulting in more flooding and spreading pollution further If the site were flooded contamination would run off and potentially harm and kill previous thought extinct Hibbertia fumana 	49\191516,50\191496,80,89,146,152,184348,31,98,139\189899,55,71	12

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> • Importation of 2 million tons of fill will change the entire water flow and flood plain area • No plans to create a site for the backed up flood waters to retreat to • It is essential that a full flood modelling study is carried out in respect of this modification proposal • Has concerns regarding the Hydrographical implications regarding volumes and quality of run-off in a wet weather event, especially as a number of drains have volume constraints • The area proposed for the Moorebank Intermodal is located on the primary floodplain for the Georges River. According to a paper entitled "Have We Forgotten About Flooding on the Georges River?" presented at the 2001 Floodplain Management Authorities Conference at the Wentworth Shire Council, planning considerations need to be made for a maximum flood, which can be up to 5 metres higher than the 100 year flood, which is 10.5 metres. • Concerned regarding design inefficiency of the drains and flood plain run-off on site, are the inlet pits screened for protection, if so what blocking mechanisms are in place? Were 		

Aspect	Issue	Summary	Respondent Reference number	Total
		blockages accounted for in design? What measures for blockage mitigation exist?		
	Fill	<ul style="list-style-type: none"> • Fill is only being added in an effort to avoid site remediation, due to contamination and dangerous materials left behind by the army • 2.2 million cubic meters of landfill is untested, land should be remediated instead • Proposed dirt may contain bio hazards and foreign matter • The fill will likely cover rare botanical specimens, aboriginal sites and cause un-remediated contamination • Land fill importation will destroy the ecology of the area, especially Georges river • If 600,000 tonnes of fill is required then the site is not suitable for the original application. • Objects to the modification of 600,000 cubic metres of fill • Importation of fill should have been mentioned in previous applications 	184348,55,60\192699,139\189899,48,58,35,77,106,80,116,133\192738,192732,14	14

Aspect	Issue	Summary	Respondent Reference number	Total
	Visual	<ul style="list-style-type: none"> There is a failure to identify and address impacts of the raised site on the important visual curtilage of historic Glenfield Farm across the spur line site and the Intermodal site across the Georges River. There is also a major polluting, noisy and extensive crushing operation that was also not described in the MPW Concept Plan approval. For these reasons the modification proposal to be rejected. Raising the site by 2 meters will further impacts on the visual capital held by Glenfield farm Does in the increase in height of building decrease the visual amenity of the buildings? And does it comply with Liverpool Local Environment Plan 2008? 	55,184348,31,71	4
Planning process	Approvals	<ul style="list-style-type: none"> Proposal should not be approved because reconfiguring the internal road network to allow Moorebank avenue to be redirected around the eastern side of the site is underhanded Objects to all aspects of the proposal being approved This proposal and the entire project should be stopped completely 	15,42\192717,45,48,58,184348,122,9,132,60\19269 9,146,152,139\189899,55,31,71	16

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> • 3 new modification applications invalidates any previous EIS findings and results, a new EIS needs to be produced to include these modifications • Objects to managing 3 modifications at the same time, it puts the community at a disadvantage to review thoughtfully each proposal and is intended to overwhelm the community and reduce meaningful community responses • The application is a major modification to the concept and should be rejected • Proposed modification is of massive not minor environmental impact, on these grounds the application should be rejected "The consent authority must first consider whether the proposed modification is of minimal environmental impact." [Environmental and Planning Law in New South Wales, Lyster, Lipman, Franklin, Witten, & Pearson, Chapter 4, Developmental Control, • Lapse, Modification and Revocation, pg. 109] • The modification application is not "substantially the same as the original development." 2 million cubic metres of fill importation is a major change 		

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> • The greens proposal to place intermodal terminals on the periphery of the cities and use both port Kembla and Newcastle ports along with port botany to distribute freight fairly and with less environmental destruction • The planning department should reject all applications and a new fully costed precinct master plan should be developed, one that includes late additions and factors in the RMS traffic impact study, PAC etc due to the new modifications • Opposed to operational movements between MPE and MPW • The overall approvals process is inherently murky and deceptive to anyone who wants to review the proposal in its entirety as the goalposts of the project are regularly moving, making it difficult to trust and comprehend the proponent's intentions • Proposal has too many pages and sections for individuals to effectively review • What applications further to this will be made which alters or sells-off the function, purpose and ownership of this site? 		

Aspect	Issue	Summary	Respondent Reference number	Total
	Combined project	<ul style="list-style-type: none"> Concerned that if this large a modification is required then the original proposal is flawed and should be thrown out This is not a modification but a whole new development This modification proposal now makes all previous studies and proposals irrelevant as the plans have changed, planning and testing should be done again and the new data presented to the public for consultation Development hasn't been fully assessed Reading and understanding 81 documents at the same time to understand and make considered objections to the proposal is unfair and constitutes inadequate consultation Opposed to the change of function of the intermodal terminal to allow interstate, intrastate and port shuttle freight rail 	35,77,106,60\192699,84,113\184175,132,192732,139\189899,15	10
	Environmental Management Documents	<ul style="list-style-type: none"> The original EIS did not allow for the amount of fill required for retail, commercial or light industrial uses and therefore should be reassessed Amendments introduce significant environmental impacts and should be 	79,84,90,9	4

Aspect	Issue	Summary	Respondent Reference number	Total
		<p>addressed separately in their own EIS not included as an amendment</p> <ul style="list-style-type: none"> PAC has raised a number of issues which SIMTA must comply with, complaint doesn't believe that they intend to comply 		
	Tech studies	<ul style="list-style-type: none"> Concerned that recent investigations show that an amount of 1,600,000 cubic metres of clean fill are now required for the site. How was this overlooked initially? The reports contain a number of mistakes. Independent studies need to be taken to find the true facts and figures. 	128,138,89,185634	4
	General	<ul style="list-style-type: none"> Visual Impact Assessment and Light spill studies show that significant landscaping, screening and architectural elements will be needed in order to shield site operations The Impact of light spill to residential properties will affect residents 24/7. The light spill study show this. Thorough research needs to be done to substantiate the project to the local people Since project was conceived the surrounding areas have been rezoned to 	35,77,79,106,128,138,130	7

Aspect	Issue	Summary	Respondent Reference number	Total
		<p>medium and high density, greatly increasing strain on traffic, resources etc.</p> <ul style="list-style-type: none"> Proposed raising of vertical alignment of Moorebank avenue for 1.5kms by 2m from the northern boundary of MPE to 120 meters south of the MPE site will require more space for the proposed site If this goes ahead the Government and the Private Consortium involved will be held accountable in a court of law. 		
	MPE Stage 2 Application	<ul style="list-style-type: none"> SIMTA shouldn't be able to apply for Stage 2 when they haven't finished modifying their concept plan Stage 2 should not be approved when concept plan and layout is not finalised Subdivision is an alarming term. Does this mean there is the potential further sale of subdivided plots for alternative uses which may not be bound by this application or time frame. Will subdivided plot be bound by the same regulation? 	22,184348,71	3
	MPW Mod 1	<ul style="list-style-type: none"> The modification application ignores the extremely close position of historic Glenfield Farm to the spur line site, and the impacts of the modifications on the Glenfield Farm site. 	55,184348,31,186234,185634	5

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> Confused by the presentation of the project and the application process, the staged release of applications, the changing of the configuration, infrastructure layout and design Confused by the terminology of intra-inter and port shuttled freight? Does this mean an extra westerly access connection from the direction of Glenfield? I cannot see the plan for this Why is the Georges River Bridge not mentioned in the REMM. Why is there no duty of care to the Casula / Liverpool Links Estate? New applications are so different from the original that new application must be made 		
Economic impacts	General	<ul style="list-style-type: none"> SIMTA is importing fill for profit Objects to the use of public funds for this privately-owned project Will benefit multinational companies who will not pay their fair share of taxes Imposing health and safety issues on a community for the benefits of business economics is unethical Forwarding freight on from its original port destination in Port Botany will 	9,1,43\184155,89,63,65\184157,70,117,122,184348	10

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> increase freight and shipping costs while unnecessarily clogging roads Increased health problems from the proposals pollution will cause an increase in the cost of Medicare and hospitals due to the increase number of people with medical conditions 		
	Reduction in property prices and compensation	<ul style="list-style-type: none"> Project would cause a decrease in property and land value Impacts to nearby residents economic wellbeing Request for reimbursement of property capital loss The intermodal project will drive new residents and investment away from the region 	3\184163,31,97\192744,108,112\192752,142\184117,197218,117,136	9
	Cost of the project	<ul style="list-style-type: none"> Raising the ground works by 2m is a waste of tax payers money Waste of tax payers funds Government has not allocated suitable funds for the required infrastructure to establish the site 	53,37,63,65\184157,136	5
Community	Consultation	<ul style="list-style-type: none"> Consultation to date has been insufficient/non existent 	106,118\181033,146,152,35,77,79,126,127,57\184238,9	11

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> SIMTA is not listening to the community and is treating it with contempt Multistorey highrise apartment buildings are being constructed within 1km of the proposed site, these new owners have not been consulted with and their views will be obstructed with the proposal Huge swathes of the broader community, who will also be affected, have been left out of the consultation process such as Bayside council area, Sutherland shire, Georges river, Canterbury, and Bankstown 		
	Impacts to community and lifestyle	<ul style="list-style-type: none"> The Proposal would impact on community, families and lifestyle. Impacting general health, traffic and environment through noise and pollution for years to come The proposal would impact young families who have settled in the area The proposal would be detrimental to community connections and depreciate the area The Proposal will decrease the quality of life for the community Extensive construction works and operation will impact the surrounding community in regards to noise, 	11\184151,30\184136,92\184171,120\184123,138,169,170\184181,176\184113,196,198,195750,110,124,128,96\191410,163,50\191496,172,191,47,109,192732,186314,16,147,34\184169,14,117,133\192738,70,79,97\192744,100,112\192752,57\184238,60\192699,104,107\184103,130,132,55,184348,186234,31,71	45

Aspect	Issue	Summary	Respondent Reference number	Total
		<p>emissions, dust, breaking, lighting and shunting</p> <ul style="list-style-type: none"> • It is unrealistic to assume that this development in such a small community will have no impact • Facility will stifle growth in an important business growth centre • Proposal fails to truly consider impacts to local residents • The proposal would change the character of the area • Industrial area not appropriate in the middle of a residential community • Densely populated family orientate residential area not suitable for such a development • The proposal will risk destroying the unique, young family orientated community, specifically one that is surrounded by the bush • The proposal is located too close to residential areas • Adverse impacts on the standard of living for local residents 		

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> • Proposal will be of detriment to health and wellbeing of residents in surrounding suburbs • Razing site 2m will put the terminal in full view of surrounding residents making their life unbearable • Diesel particle pollution and traffic will have a negative impact on residents and has not been looked at properly • Many residents have illnesses and the current peaceful and green environment minimise symptoms and aid recovery • Project will expose surrounding community to known carcinogens • Objects to extended working hours close to residents • Hours of operation (0600-2200 mon-fri and 0700-1800 weekends) is intrusive and will negatively affect families and residents. 		
	Social	<ul style="list-style-type: none"> • It's morally wrong to do this to residents in the area • Proposal is too close to homes and schools 	44,132,31,71	4

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> Objects to the impacts of the Proposal on quality of life such as the amenity of open spaces and travel times. 		
	Safety	<ul style="list-style-type: none"> Traffic caused by the proposal will be dangerous and compromise the safety of residents Concerned that SIMTA's official report states at this point that there is a 20 fold higher crash rate than the RMS threshold for blackspots on Moorebank and Cambridge avenue, 2 fatalities over 5 years and MICL's EIS which states a 40 fold higher crash rate than the RMS threshold on the M5 between Heathcoat Road and the Hume highway, while the report states that between 75-85% of intermodal trucks will use these blackspots and 100% will use Moorebank Avenue. With 25% using Sydney's worst blackspot. Therefore, they are concerned this will result in more deaths Pollution and operation of the site will cause sleep deprivation which will cause increased instances of health issues 	92\184171,94,127,31	4
Flora and Fauna	General	<ul style="list-style-type: none"> Project would impact on native flora and fauna and destroy habitat for local species 	27\184173,5,9,38,161,67,197218,122	8

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> Concerned project would threatened species including 45 trees with nesting hollows Project would impact endangered flora and fauna thought to be extinct, specifically Hibbertia Fumana Concerned for impacts to rare, endangered and previously thought extinct species Concerned project is reducing vegetation in the riparian corridor, how is this going to be offset This modification shows that key information was withheld until after the approvals process relating to previous thought extinct species Did SIMTA know in advance that there were previously thought extinct plant species on site and try to cover it up? Have they already damaged the plants? 		
	Impacts to native species	<ul style="list-style-type: none"> Project will impact Hibbertia Fumana previously thought to be extinct, no impact study has been performed to determine effects on the plants habitat Impacts from removal of 45 hollow bearing trees 	159\189971,146,152,5	4

Aspect	Issue	Summary	Respondent Reference number	Total
		<ul style="list-style-type: none"> Non reporting of extinct flora until 4 days after the report points to dishonesty and shows no community consultation 		

Moorebank Precinct West - Concept Modification

Supplementary Response to Submissions -
SSD 5066 MOD1

Appendix B - Additional supporting information



SIMTA

SYDNEY INTERMODAL TERMINAL ALLIANCE

Part 4, Division 4.1, State Significant
Development

Response to LCC review of MPW Concept Modification Report (2016)

This document has been prepared in response to a submission provided by Liverpool City Council for the Moorebank Precinct West Concept Modification Response to Submissions (MPW Concept Modification RtS) Document. More specifically, the submission requests that key overarching issues raised within a previous submission (also raised by LCC, 2016) for the Moorebank Precinct West Concept Modification Report (MPW Concept Modification Report) be addressed in further detail, noting that the original submission responses provided for the MPW Concept Modification were too brief, with several outstanding issues remaining.

The following tables have been prepared to provide a response to current submissions and, where required, a deeper insight of key issues raised previously by Council, to promote transparency across the assessments.

Statutory Planning

Issue	Comment	Response	Reference
Justification for modification under Section 96(2) of the EP&A Act	The scale of impact, resulting primarily from the magnitude change in the number of construction truck movements proposed, as a result of the modification and the resultant noise, air quality and human health impacts, create a step change in the development. Consequently, it is considered that the proposed development is not 'substantially the same' as that approved.	<p>The MPW Stage 2 Revised CTIA (Appendix C of the MPW Stage 2 RtS) provides assessment of construction traffic impacts to facilitate the Amended Modification Proposal (proposed to be undertaken during Stage 2 of the MPW Project). The results in Section 6.1 of this report indicate that during the peak cumulative construction scenario (scenario 2), the construction traffic contribution of the Amended Modification Proposal in peak periods is relatively small compared to the existing traffic volumes on Moorebank Avenue. The construction traffic impact along Moorebank Avenue is anticipated to be minor and not a step change in the development.</p> <p>Further assessment of resultant noise, air quality and human health impacts from the Amended Modification Proposal are provided in Sections 7.1.2, 7.1.7 and 7.1.12 of the MPW Concept Modification RtS. The findings from these assessments indicate that the Amended Modification would result in impacts slightly above those identified in the MPW Concept Approval, and would be able to be adequately managed through the preparation and implementation of the CEMP, in accordance with REMM 1B.</p> <p>Overall, the environmental assessment concludes that the Amended Modification Proposal would facilitate for the development of an intermodal terminal facility with the same IMT throughput limitations, warehousing GFA, freight village, truck parking and other ancillary development as provided within the MPW Concept Approval. Further, the assessment also concludes</p>	<p>Section 6 and 7 of the MPW Concept Modification RtS</p> <p>Section 6.1 of Appendix C of the MPW Stage 2 RtS</p>

Issue	Comment	Response	Reference
		that the Amended Modification Proposal overall would not result in any additional environmental impacts that could not be adequately managed through the implementation of the Ministers Conditions of Approval (MCoA), the Revised Environmental Management Measures (REMMs) provided within the MPW Concept Approval and additional mitigation measures provided in Section 7 of the MPW Concept Modification RtS (included in Section 6 of this SRtS).	

Traffic

Issue	Comment	Response	Reference
Increased construction traffic volumes	Clarification is sought as to whether these heavy vehicles movements are in addition to those already considered in the Early Works outlined in the Concept Plan Approval	<p>The heavy vehicle movements in question were the subject of the original Modification Proposal as presented within the MPW Concept Modification Report, which would have been additional to heavy vehicle movement originally outlined in the MPW Concept Approval. These heavy vehicle movements are now proposed as part of the MPW Stage 2 Proposal, as per the Amended Modification Proposal (refer to Section 6 of the MPW Concept Modification RtS).</p> <p>The construction traffic volumes provided within the MPW Stage 2 Proposal include all movements for the importation of fill proposed under the Amended Modification Proposal. The construction volumes are included in Table 5-1 of the Revised CTIA provided in Appendix C of the MPW Stage 2 Response to Submissions report (MPW Stage 2 RtS).</p>	<p>Section 6 of the MPW Concept Modification RtS.</p> <p>Appendix C of the MPW Stage 2 RtS</p>
	The proposal modification will increase the daily HV movements generated during Early Works by 37 fold, significant higher impacts not considered in Concept plan approval	<p>Heavy vehicle movements that were previously associated with the Modification Proposal as reported in the MPW Concept Modification Report (i.e. additional heavy vehicles importing clean general fill during Early Works), would now be undertaken across a longer timespan during Stage 2 of the MPW Project (as outlined in Section 6 of the MPW Concept Modification RtS).</p> <p>The reference to a 37-fold increase in truck movements is a reference to predicted construction vehicle volumes during Early Works as stated within Table 11-5 of the MPW Concept EIS. Heavy vehicle movements during Stage 2 of the MPW Project are predicted to be 740 (round-trip) movements per day during peak construction works phase, which is</p>	Section 7 of the MPW Concept Modification RtS

Issue	Comment	Response	Reference
		<p>generally consistent with the stated movements for MPW Stage 2 in the MPW Concept EIS.</p> <p>An assessment of construction traffic impacts associated with the importation of clean general fill for the Amended Modification Proposal is provided in Section 7.1 of this RtS. Assessment results indicate that construction traffic during peak morning and afternoon periods for the Amended Modification Proposal, would maintain a LoS of C or better at key intersections.</p>	
	Clarification is sought as to whether estimated light vehicles movements considered Early Works traffic volumes as outlined in Concept Plan Approval and PB traffic report (2014, Section 11.4)	Additional light vehicle movements generated by the Modification Proposal would no longer be generated during Early Works. These traffic movements would be undertaken as part of the MPW Stage 2 Proposal. Refer to the Table 5-1 of the Revised CTIA provided in Appendix C of the MPW Stage 2 RtS).	Appendix C of the MPW Stage 2 RtS.
	Clarification is sought whether staging of works as reported in the PB report (2014) will occur concurrently or subsequent to those now outlined under the Modification Proposal.	<p>The Amended Modification Proposal seeks to modify the MPW Concept Approval for the importation of clean general fill material. The physical importation of fill is now proposed to be undertaken as part of the MPW Stage 2 Proposal (subject to separate approval), rather than Early Works.</p> <p>The Amended Modification Proposal also seeks to modify the staging of future applications. As described in Section 6.2 of the MPW Concept Modification RtS, since the preparation of the MPW Concept EIS, the proposed phasing of the MPW Project has changed, to align with constructability and operational efficiencies at the site. The staging of the MPW Project, as included in the Modification Proposal, would replace the staging works as reported in the PB Report (2014) and would, therefore, not be undertaken concurrently or subsequent to those now outlined under the Modification Proposal.</p>	<p>Section 6.2, Section 7.1.1 of the Concept Modification RtS.</p> <p>Section 7 and Appendix M of the MPW Stage 2 EIS.</p> <p>Section 7 and Appendix D of the MPW Stage 2 RtS.</p>

Issue	Comment	Response	Reference
Distribution of Modification Vehicle Movements	<p>The CTIA has distributed all light vehicle (LV) and heavy vehicle (HV) movements (with the exception of those removing ACM material to the Glenfield Waste Facility south of the site) generated by the Modification Proposal to/from the north of the MPW site.</p> <p>The LV traffic distribution does not allow for any staff traffic to arrive or depart to the south. This is considered inaccurate given the tidal traffic flows observed along Moorebank Avenue and the location of the site relative to residential development.</p> <p>The distribution of heavy vehicle traffic to/from the north is accepted given the truck size restrictions on Moorebank Avenue south of the site. It is noted however that heavy vehicle movements have been directionally split 50/50 to and from the east and west (CTIA, Appendix A) which appears arbitrary.</p> <p>Justification for these distributions should be provided given that an uneven split may have an impact on the operation of the M5 Interchange.</p>	<p><u>Light vehicle traffic distribution</u></p> <p>The location of the MPW site and the construction access is within close proximity to M5 Motorway which provides a major transport route option to the site via M7 and M31 in each direction. The staff traffic was assumed to be from the wider regions of Sydney (non-local traffic) and would be avoiding and/or have no local knowledge of the local road network, including Cambridge Avenue.</p> <p>Additionally, the majority of construction staff are expected to arrive at the Proposal site before 7am which is before the commuter peak of 8-9am. As such, construction staff are anticipated to use the M5 Motorway to gain access to the Proposal site which is not going to be congested at that point in time (i.e. before 7am) and would provide the most efficient access to the site.</p> <p>The total traffic generation for staff vehicles is expected to be less than 60 vehicle per hour where, should a small proportion of the staff vehicles come from the south via Cambridge Avenue, there would be a negligible impact on Moorebank Avenue (i.e. less than one vehicle every minute).</p> <p>Distribution diagrams are provided in the MPW Stage 2 RtS (Appendix C - Revised CTIA).</p> <p><u>Heavy vehicle traffic distribution</u></p> <p>This 50/50 east/west directional assumption in the MPW Concept Modification CTIA has been based on consideration of existing count data for heavy vehicles which indicated an approximate (order of magnitude) 50/50 East-West traffic distribution of HVs in the peak periods at the M5 Interchange.</p> <p>Furthermore, as the fill source and fill location has not been finalised, a 50/50 split assumption has been adopted and considered appropriate and realistic.</p> <p>Distribution diagrams are provided in the MPW Stage 2 RtS (Appendix C - Revised CTIA).</p>	MPW Concept Modification CTIA (Appendix B of the MPW Concept Modification Report)
Base Traffic Volumes	Clarification for different growth factors reported in Modification Proposal (1.8%) and CTIA (1.65%)	There is a typographical error in Section 3.2 of the MPW Concept Modification CTIA. The last paragraph should read that ' <i>The future background traffic growth was assumed to be an average of 1.658%</i>	Section 3.2 of the MPW Concept Modification CTIA

Issue	Comment	Response	Reference
		<i>per annum for the study area</i> . This is consistent with the 1.8% growth factor used in for the MPW Concept Modification CTIA.	
	Background information should be provided to justify these growth factors [used to estimate current traffic volumes] and the forecast traffic volumes, particularly the negative growth forecast on the Moorebank Avenue south of Anzac Road during the AM peak period.	A minor reference error in the growth forecast calculation model has been detected which caused an unbalanced arrival/exit traffic flows between intersections which has resulted in negative growth south of the Anzac Road / Moorebank Avenue intersection for the background traffic. This minor error has been corrected for MPW Stage 2 RtS (Appendix C - Revised CTIA) which has resulted in balanced arrival/exit traffic flows between intersections and in turn addresses the negative growth identified. All the affected analysis has been updated accordingly.	Appendix A of the MPW Stage 2 CTIA RtS
	Clarification for the difference between traffic volumes (existing) used as inputs in the SIDRA models and those shown in Appendix A of CTIA report for existing condition analysis (AM/PM)	The assessment conducted for the MPW Concept Modification Proposal within the MPW Concept Modification Report has been superseded. Updated SIDRA analysis, relevant to the Amended Modification Proposal, is provided in the MPW Stage 2 RtS. Please refer to the MPW Stage 2 RtS (Appendix C – Revised CTIA).	Appendix A of the MPW Stage 2 CTIA RtS.
Suggested Intersection Mitigation Measures	No concept layout plans are provided with CTIA to illustrate proposed mitigation works.	It is acknowledged that the Modification Proposal CTIA did not include concept layout plans which illustrated proposed mitigation works; however, these were described in Section 5.13 of the Modification Proposal CTIA (Appendix B of the MPW Concept Modification). Proposed mitigation measures during construction of the Amended Modification Proposal are outlined in Section 7 of Appendix C of the MPW Stage 2 RtS (Revised CTIA).	Section 5 of the MPW Concept Modification Report. Section 7 of the Revised CTIA (Appendix C of the MPW Stage 2 RtS Appendix C of the MPW Stage 2 RtS.
	Unclear as to the location of the proposed Northern Access Point to be used for access for the modification works.	The Concept Approval included an assessment of five access locations along Moorebank Avenue. The Northern access, as described in Section 5.1 of the CTIA for the MPW Concept Modification Report (Appendix B), is located approximately 118 metres south of the DSND access.	Section 5.1 of Appendix B of the MPW Concept Modification Section 4.4 of Appendix C of the

Issue	Comment	Response	Reference
		<p>As outlined in Section 1 of the MPW Concept Modification RtS, the Amended Modification Proposal seeks to modify only the MPW Concept Approval for the importation of clean general fill material.</p> <p>As outlined in the MPW Stage 2 RtS (Appendix C - Revised CTIA, Section 4.4), site access to facilitate the Amended Modification Proposal would be located at the Chatham Avenue / Moorebank Avenue intersection and Anzac Road / Moorebank Avenue intersection.</p>	MPW Stage 2 RtS
	Clarification on the constructability of the proposed layouts given existing site constraints e.g. power poles, bridge and bicycle lanes	<p>The Amended Modification Proposal is a modification to the MPW Concept Approval and no longer seeks to modify Early Works for the importation and placement of clean general fill.</p> <p>Considerations of constructability aspects regarding intersection adjustments required to facilitate fill importation under the Amended Modification Proposal are outlined in the MPW Stage 2 RtS (Appendix C - Revised CTIA, Section 6).</p>	Section 6 of Appendix C of the MPW Stage 2 RtS
Traffic Analysis	PB traffic report for Concept Planning approval reported that the Bapaume Road/Moorebank Ave intersection will perform at LOS F in both AM and PM peak for existing 2015 conditions, but CTIA shows it will perform at LOS A	The LOS F in both the AM and PM (reported in the MPW Concept EIS, prepared by PB [2014]) refers to the worst-case right-turn movement from Bapaume Road to Moorebank Avenue. The CTIA for the MPW Concept Modification Report (Appendix B) reported the overall intersection LOS performance (i.e. LOS A) which aligns with PB (2014). The LOS for the overall intersection is the average delay experienced for all movements combined at the intersection.	Appendix B of the MPW Concept Modification Report
	PB 2014 “base case” traffic volumes for the Bapaume Road / Moorebank Avenue intersection indicate that the through volumes (north and southbound combined) are 15%-18% higher than those used in the CTIA which are identified as 2015.	According to the MPW Concept EIS, the “base case” traffic data at the Bapaume Road/Moorebank Avenue intersection were based on traffic counts conducted in December 2010 by PB and calculated to 2014 using growth rates extracted from the Sydney STM EMME/2 model, developed by the Bureau of Transport Statistics. The 2015 “base case” counts used by Arcadis are based on more recent traffic count surveys conducted in March 2015 by Roads and Maritime for the development of the Roads and Maritime LMARI AIMSUN model.	N/A
Review of SIDRA Analysis	Gap acceptance parameters used in the SIDRA models are below Austroads Standards.	The gap acceptance parameter (at the Bapaume Road/Moorebank Avenue intersection) has been amended to SIDRA default and used in the updated SIDRA models prepared for the Revised CTIA prepared for the MPW Stage 2 RtS, as per <i>Roads and Maritime Services (Roads and Maritime) Traffic Modelling Guidelines (version 1.0, February 2013)</i> .	Appendix C of the MPW Stage 2 RtS

Issue	Comment	Response	Reference
	Incorrect “Extra bunching” input values used for upstream signalised intersections, which can artificially boost the performance of the intersection.	Extra Bunching inputs generally adhere to Table 5.2.1 of the SIDRA Intersection User Guide which provides the percentage to be adopted depending on the closeness of nearby intersections. The extra bunching parameter has been amended to SIDRA default and used in the updated SIDRA models prepared for the Revised CTIA prepared for the MPW Stage 2 RtS, as per <i>Roads and Maritime Services (Roads and Maritime) Traffic Modelling Guidelines (version 1.0, February 2013)</i> .	Appendix C of the MPW Stage 2 RtS
	Justification for the use of reduced pedestrian volumes compared to default SIDRA settings of 50 pedestrians per hour.	Reduced pedestrian volumes have been assumed in the SIDRA modelling for the MPW Modification Proposal CTIA (Appendix B) because of the land uses along Moorebank Avenue being non-residential. The nearest residential land use (by road) is located over 700 metres from the MPW site (from Moorebank Avenue) at Delfin Drive, off Anzac Road. Further, a “walk-with-traffic” phasing arrangement for the pedestrian phase in SIDRA has been adopted which minimises the impact on green times and intersection performance.	Appendix B of the MPW Concept Mod
	Justification for the use of 60 minutes for Peak Flow Factor (instead of 30 minutes) which in-turn changes the Peak Flow Factor from 95% to 100% i.e. results in reduced traffic demand being considered in the analysis. This can have a significant effect on the performance of the intersection.	The Peak Flow Factor parameter has been amended to SIDRA default (i.e. 95%) and used in the updated SIDRA models prepared for the Revised CTIA prepared for the MPW Stage 2 RtS, as per <i>Roads and Maritime Services (Roads and Maritime) Traffic Modelling Guidelines (version 1.0, February 2013)</i> .	Appendix C of the MPW Stage 2 RtS
	Signal coordination (Arrival type 4) has been assumed in the analysis. However, different signal cycle times has been used in the SIDRA analysis which suggest no signal coordination along the Moorebank Avenue corridor.	Signal coordination (arrival type) parameter has been amended to SIDRA default and used in the updated SIDRA models prepared for the Revised CTIA prepared for the MPW Stage 2 RtS, as per <i>Roads and Maritime Services (Roads and Maritime) Traffic Modelling Guidelines (version 1.0, February 2013)</i> .	Appendix C of the MPW Stage 2 RtS
	A number of cycle times specified for signalised intersections are quite low (50-60 seconds). The phase times have been set manually, and may not	The SIDRA models (in the MPW Modification Proposal) have been modelled as a “Network” i.e. isolated intersections linked together, without signal coordination. The proposed cycle times are for isolated intersections which have been determined by SIDRA and can be used	N/A

Issue	Comment	Response	Reference
	represent a realistic scenario. SCATS signal data (phase/cycle times - for peak hour periods should be provided to verify phase times are correct (average for the peak hour periods).	as a basis for SCATS. The signal data can then be calibrated on-site using SCATS. Providing this information is typically not standard practice.	
	Clarification on the use of modified signal phase and cycle times between “Existing” and “Existing + Construction” traffic scenarios	Due to the changes in traffic volumes from “Existing” to “Existing + Construction”, signal phase times and cycle times were adjusted in order to provide optimal green times allocated to different phases. Phase sequences remained unchanged between the models.	N/A
Recommendations	Comprehensive network wide assessment needed to inform CTIA	The scope of the Modification Proposal CTIA has been conducted to comply with the requirements of SEARs and REMMs for the MPW Concept Approval (SSD 5066). These are in line with study area network as per the MPW Concept Approval and therefore considered appropriate.	N/A

Air Quality

Issue	Comment	Response	Reference
Lack of detailed maps	There are no detailed maps showing the location of specific activities, such as on site stockpiling, crushing and screening, or haul routes to gain an understanding of how the assessment has been completed.	Figure 4 of the MPW Concept Modification Report (refer to page 18) outlines the area of impact, the area for onsite stockpiling, the site compound including area for materials crushing and screening, associated with the MPW Concept Modification Proposal. The location of haul roads during construction, as described in Section 2.2.2 of the MPW Concept Modification Report, would be within the area of impact as outlined in Figure 4 of that report, with an internal haul route travel distance of approximately 2 km per trip. The Amended Modification Proposal seeks approval for the importation and placement of clean general fill as part of MPW Stage 2. The Amended Modification Proposal construction layout is illustrated in Figure 6-3 of the MPW Concept Modification RtS.	Figure 4 and Appendix F of MPW Concept Modification Report Section 7 of the MPW Concept Modification RtS
Lack of emission inventory data	Only high-level detail has been provided regarding the emissions inventories which does not allow the reader to review the validity of	The level of detail provided in the emission inventories used for the Air Quality Impact Addendum (refer to Appendix F of the MPW Concept Modification Report), is consistent with what was provided the MPW	Section 4 of the Air Quality Impact Addendum (Appendix F of the MPW

Issue	Comment	Response	Reference
	assumptions used in the emissions calculations for the Modification.	<p>Concept Approval (ENVIRON, 2014) and the SRtS AQIA (ENVIRON, 2015a).</p> <p>The Emission inventory included within Section 4 of the Air Quality Impact Addendum includes assumptions that are based on industry best practice, including those that inform heavy vehicle generation, operation of plant, exposure to wind erosion, emissions control through use of water carts, and emissions adjustments for predicted vehicle speeds. The emissions factors applied, which are developed by the US EPA⁵, together with the assumptions provided, are considered appropriate to enable a reassessment of emission calculations.</p>	Concept Modification Report)
Inconsistencies between MPW Concept EIS and Modification Report for MPW Stage 1 Engineering fill emissions.	<p>A comparison of emissions from Early Works as given in ENVIRON 2015(b) is presented in Table 3-6. Total emissions from the Early Works are slightly higher in ENVIRON 2015(b) than for the proposed Modification, yet the text suggests additional activities are occurring which would typically result in higher dust emissions. This potential inconsistency between the studies should be considered further before determination can be made, with the modelling data and assumptions made available for review.</p>	<p>Table 3-6 of the LCC submission (Cardno, 2016) presents a minor discrepancy in particulate emissions estimates for the MPE Stage 1 Engineering Fill Phase as reported in the MPW Concept Modification Report and MPE Stage 1 AQIA (ENVIRON 2015(b)), however the submission has incorrectly entered the information alongside the Early Works emissions estimates.</p> <p>The emission estimates used with ENVIRON 2015(b) for MPE Stage 1 (regarding engineering fill volumes) are consistent with those used for the MPW Concept Modification Proposal cumulative assessment. The minor change in emissions estimates between the MPE Stage 1 (Environ 2015b) Report and the MPW Concept Modification Report is a result of values within Table 16 (ENVIRON 2015(b)) not having been updated from the previous draft, which showed slightly higher earthworks volumes, resulting in increased emissions estimates.</p>	<p>Appendix M of MPE Stage 1 EIS</p> <p>Appendix F of MPW Concept Modification Report</p>
	Based on the findings of this review it is anticipated that the Modification would not change the final project. However, the proposed changes would significantly increase on site dust emissions during construction, with residential areas located directly to the west across the Georges River, as well as further to the north and south.	An assessment of air quality impacts (refer to Section 7 of the MPW Concept Modification RtS) provides a comparison of changes from the MPW Concept Approval to the Amended Modification Proposal, and an assessment of associated air quality impacts. The results of this assessment indicate construction phase emissions from the Amended Modification Proposal would comply with all relevant impact assessment criteria. A Dust Management Plan (DMP) or equivalent, in accordance with REMM 10A (refer to Section 8 of this Report) would be developed and implemented for the Amended Modification Proposal.	Section 7 of the MPW Concept Modification RtS

⁵ United States Environmental Protection Agency (US EPA) AP-42 Compilation of Air Pollutant Emission Factors (US EPA, 1998b, US EPA, 2004, US EPA, 2006)

Issue	Comment	Response	Reference
Consideration for air quality and subsequent human health impacts resulting from a 37-fold increase in off-site truck movements	<p>Arcadis has estimated that up to 745 heavy vehicles (truck and dog or semi-trailer) will be required to move fill to/from the site daily during the peak early works stage. This equates to 1,490 heavy vehicle movements per day.</p> <p>The Arcadis modification report (Section 3.1) cites the Parsons Brinckerhoff (2014) documentation prepared for the Concept Plan approval which estimated around 64 heavy vehicle movements would be generated by the site per day. It is further explained that construction deliveries to the site were subsequently restricted in the Response to Submissions to a maximum of 40 heavy vehicle movements per day.</p> <p>Therefore, the proposed modification will increase the daily number of heavy vehicle movements generated during the Early Works by around 37 fold. This is a significant increase which will cause amenity impacts during the early works period that were not considered in the concept plan approval.</p>	<p>The Amended Modification Proposal is a modification to the MPW Concept Approval and no longer seeks to modify Early Works for the importation and placement of clean general fill. The importation and placement of clean general fill would be undertaken during Stage 2 of the MPW Project.</p> <p>The reference to a 37-fold increase in truck movements is a reference to predicted construction vehicle volumes during Early Works as stated within Table 11-5 of the MPW Concept EIS. Heavy vehicle movements during Stage 2 of the MPW Project are predicted to be 740 (round-trip) movements per day during peak construction works phase, which is generally consistent with the stated movements for MPW Stage 2 in the MPW Concept EIS.</p>	Sections 6, 7 and 8 of MPW Concept Modification Report

Noise and Vibration

Issue	Comment	Response	Reference
OOH criteria	Out of standard hours (OOH) noise criteria should consider background noise levels relative to the out of hours period selected.	<p>Out of hours (OOH) noise criteria is outlined in Section 5.4.2 of the MPW Concept Modification Report and is derived from the NSW EPAs <i>Interim Construction Noise Guideline</i> (ICNG).</p> <p>A review of the noise monitoring plots indicates that ambient L₉₀ noise levels in nearby residential noise catchment areas typically increase</p>	Section 5.4.2 of the MPW Concept Modification Report

Issue	Comment	Response	Reference
		from 5:00am and are typically equal to or greater than the daytime RBL from approximately 6:00am onwards. Therefore, the daytime RBL is considered representative of the background noise levels in OOH periods 1 (6:00am – 7:00am weekdays), 3 (7:00am – 8:00am Saturday) and 4 (1:00pm – 6:00pm Saturday). OOH period 2 occurs during the evening (6:00pm – 10:00pm) period and therefore, the evening RBL has been used to establish the OOH noise management levels during OOH period 2.	
Lack of information informing assessment	Number, type of equipment and duration adjustments included in modelling are not presented in the construction noise assessment.	An indicative list of plant and equipment likely to be required for the works associated with the MPW Concept Modification Proposal is included in Section 3.2.7 of the MPW Concept Modification Report. The level of detail provided is consistent with that provided for the MPW Concept EIS and is considered appropriate for this level of assessment. Further detail would be provided, as relevant, in the MPW Stage 2 CEMP.	Section 3.2.7 of the MPW Concept Modification Report
Annoyance adjustments not discussed	Annoyance adjustments for particularly annoying activities as described in the <i>Interim Construction Noise Guideline</i> (DECC 2009) have not been discussed. Where annoying noise sources are anticipated penalties should be applied to these sources.	In situations where “particularly annoying” construction activities (refer to Section 4.5 of the <i>Interim Construction Noise Guideline</i>) are conducted in close proximity to sensitive receivers, and those activities dominate the overall construction noise levels at the receiver location, adding a penalty of up to 5 dBA to account for increased annoyance is appropriate. However, due to the large separation distances between construction activities for the Proposal and sensitive receivers, and the large number of individual construction plant items that may operate concurrently, many of which would not be regarded as “particularly annoying”, it is considered unlikely that any particularly annoying noise characteristics would be identified at sensitive receiver locations. Therefore, no adjustment to the assessment is considered necessary.	Section 4.5 of the <i>Interim Construction Noise Guideline</i>
Assessment of meteorological effects on noise propagation relative for the Modification not sufficient	Meteorological effects on noise propagation are not qualified in the assessment of noise impacts. As the construction works are proposed to be extended into the evening period over a six to nine-month time frame, and the separation distances are such that meteorological effects can have a significant influence on receiver noise levels, the assessment should consider whether noise enhancing	The construction noise assessment for the Amended Modification Proposal was conducted in accordance with the ICNG. The ICNG provides no guidance on the consideration of meteorological effects. Accordingly, reference is made to the NSW Industrial Noise Policy (INP), which provides guidance on assessing the influence of meteorological effects on noise. The INP does not recommend that temperature inversion effects are considered for the evening (6:00pm – 10:00pm) period. Accordingly, it is considered unlikely that temperature inversions would significantly affect construction noise impacts associated with the Amended Modification Proposal.	N/A

Issue	Comment	Response	Reference
	temperature inversion conditions as identified in the Moorebank Intermodal Terminal (SLR 2015) would be applied to construction activities. The Moorebank EIS predicted noise increases of 3 – 5 dB(A) during inversion conditions.		

Stormwater and flooding

Issue	Comment	Response	Reference
Construction management documentation clarification	Given that the development works area far exceeds 2,500 m², development of a Soil and Water Management Plan (SWMP) would be appropriate, rather than an ESCP, as per guidance contained within the Blue Book (Landcom, 2004).	The physical importation of fill as per the Amended Modification Proposal is proposed to be undertaken during Stage 2 of the MPW Project. As per the mitigation measures included within the MPW Stage 2 EIS (refer to Table 22-1 of the MPW Stage 2 EIS), a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) would be prepared in accordance with the principles and requirements of the Blue Book.	Section 22 of the MPW Stage 2 EIS
	<p>A SWMP typically provides more detail than an ESCP. As such, the following should be included in the SWMP, or additional supporting documentation provided in the report as necessary:</p> <ul style="list-style-type: none"> • High-flow bypass weir designs for sediment basins. • Sediment basin overflow discharge locations and connections. The note provided advising that this be determined by the contractor is not considered to be sufficient for a project of this scale and significance. • Expected clean-out frequency of basins. • The “Remarks” column included in the ESCP tables provide reference 	As above, A SWMP would be developed for the Amended Modification Proposal as per the mitigation measures set out in the MPW Stage 2 EIS, in accordance with Blue Book guidelines. Components mentioned in the submission would be considered and included as appropriate.	Section 7.1 of the MPW Concept Modification RtS

Issue	Comment	Response	Reference
	to a number of report sections, where presumably more information is available to support the results presented. It is unclear as to which report(s) are being referenced, this should be elaborated on the plan.		

Geotechnical and Soil

Issue	Comment	Response	Reference
Geotechnical			
Greater understanding of subsurface material is required and its ability to support overlaying of imported fill material	Cardno consider that the potential for significantly different performance of the existing subgrade (Golder, 2016) needs to be addressed in the design. This must take into consideration the response to groundwater, ground improvement of geotechnically unsuitable material, removal of contaminants (if removed), or otherwise the containment (capping) of contaminants with a suitable non-permeable material (e.g. clay or liner).	<p>The subgrade conditions vary across the site, reflective of the site's history and uses over time. As outlined in the Geotechnical and Contamination Memorandum (refer to Appendix C of the MPW Concept Modification Report), anthropogenic fill and other materials may contain asbestos, which would be managed onsite in accordance with the Asbestos in Soils Management Plan, to be prepared as a sub-plan to the CEMP for the MPW Stage 2 Proposal.</p> <p>As outlined in Section 2.3 of the Geotechnical and Contamination Memorandum (refer to Appendix C of the MPW Concept Modification Report), the impact of clean general fill placement works on groundwater levels would be dependent on a number of factors to be confirmed during detailed design. This includes the manner in which the stockpile foundations are established, the nature of imported materials and the surface drainage within and around the stockpiling area. Ongoing groundwater monitoring is anticipated as part of the Long-Term Environmental Management Plan (LTEMP) for the site.</p> <p>Remediation and validation works would be undertaken to the extent permissible for Early Works under the MPW Concept Approval. As stated in Section 3.2 of Appendix C of the MPW Concept Modification Report, provision for addressing unforeseen zones of 'unsuitable' material will be addressed within the Earthworks Specification during detailed design.</p> <p>Excavated materials would be disposed of in accordance with the requirements of the Waste Management Plan (or equivalent), to be</p>	<p>Section 6 of MPW Concept Modification RtS</p> <p>Appendix C of MPW Concept Modification Report</p>

		prepared for the CEMP for the MPW Stage 2 Proposal, at a facility appropriately licenced by the NSW EPA for the receipt of excavated unsuitable material. The nature and geological composition of the imported fill material to be used as capping material as part of the Amended Modification Proposal, would be outlined as part of the Earthworks Specification, to be prepared as part of the CEMP (or equivalent) for the MPW Stage 2 Proposal.	
Design parameters insufficient	Notwithstanding previous comments made by Cardno on Golder's Geotechnical Interpretive Report (GIR) in Appendix Q of the EIS prepared by Hyder (2015); it is inadequate to novate the former design parameters to a substantially different earthworks model, whereby foundation preparation requirements are only addressed in a later Earthworks Specification.	<p>As discussed, bulk earthworks activities as part of the MPW Concept Modification Proposal would now be undertaken as part of the MPW Stage 2 Proposal as identified under the Amended Modification Proposal (refer to Section 6 of the MPW Concept Modification RtS). An Earthworks Specification would be prepared and included as part of the CEMP for the MPW Stage 2 Proposal, as outlined in the Geotechnical and Contamination memorandum (refer to Appendix C of the MPW Concept Modification Report), to provide site specific details regarding:</p> <ul style="list-style-type: none"> • Earthworks material criteria, • Handling and placement requirements, • Embankment and cutting formation (including foundation, batter and benching requirements), • Unsuitable material and bridging layer requirements, • Conformance testing methods; and • Acceptance criteria (e.g. for material acceptance and compaction control). 	<p>Section 6 of MPW Concept Modification RtS</p> <p>Appendix C of MPW Concept Modification Report</p>
Suitability of sandstone as capping material	The proposed imported sandstone alone would not comprise a suitable containment (capping) material. The compacted sandstone will have a high permeability that will allow high surface water / groundwater interaction, and potential to mobilise 'contained' contaminants.	The Amended Modification Proposal included within the MPW Concept Modification RtS includes the importation of clean general fill as part of the MPW Stage 2 Proposal, rather than Early works as proposed in the MPW Concept Modification Report. The nature and geological composition of the clean general fill material would be specified as part of the Earthworks Specification, to be prepared as part of the CEMP (or equivalent) for the MPW Stage 2 Proposal. The specifications provided would be suitable for use as capping material as part of the Amended Modification Proposal.	N/A
Insufficient consideration to constructability given short	With the substantially different earthworks model indicating importation of 1,600,000 m³ of fill occurring over a period of six to nine	The Amended Modification Proposal presented in the MPW Concept Modification RtS includes the importation of clean general fill as part of Stage 2 of the MPW Project, rather than Early works as proposed in the MPW Concept Modification Report. This change would see the importation of clean general fill be undertaken over a longer timespan	<p>MPW Stage 2 EIS</p> <p>Section 6.3 of the MPW Concept Modification RtS</p>

construction time period	months; far greater consideration of constructability is required.	with further constructability consideration detailed within documentation prepared for Stage 2 of the MPW Project (refer to the MPW Stage 2 EIS and Section 6.3 of the MPW Concept Modification RtS).	
--------------------------	--------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

Non-Indigenous Heritage

Issue	Comment	Response	Reference
Assessment does not provide sufficient detail	The Memorandum should be revised to include a detailed discussion of the proposed changes to the development and associated impacts on heritage values.	<p>An assessment of the potential non-Indigenous heritage impacts of the Amended Modification Proposal, in consideration of those assessed for the MPW Concept Approval was included in Section 7.1 of the MPW Concept Modification RtS. The assessment identified that the Amended Modification Proposal would not result in additional impacts to non-Indigenous heritage beyond those identified in the MPW Concept Approval.</p> <p>The MPW Concept Approval identifies salvage of heritage items are to be undertaken predominantly during Stage 1 (Early Works), with some residual salvage undertaken as part of Stage 2 of the MPW Project. An Unanticipated Discoveries Protocol would be followed in the event that historical items or relics or suspected burials are encountered during excavation works, in accordance with REMM 13K for the MPW Concept Approval.</p>	Section 7.1 of the MPW Concept Modification RtS
Mitigation measures should be reviewed and revised	An effort should be made within the Concept Plan Modification to review and improve, as required, existing mitigation measures.	<p>As outlined within Table 2 of the Non-Aboriginal (Historic) Heritage Memorandum (Refer to Appendix I of the MPW Concept Modification Report), the REMMs identified in the MPW Concept Approval have been reviewed and additional mitigation measures identified where necessary. This process has also been undertaken for the Amended Modification Proposal (refer to Section 8 of the RtS). No additional mitigation measures are required for the Amended Modification Proposal.</p> <p>Section 6 of this SRtS provides a summary of the additional mitigation measures which would be included in the MPW Concept Approval, should the Amended Modification Proposal be approved.</p>	<p>Appendix I of the MPW Concept Modification Report</p> <p>Section 6 of this SRtS</p>
Retention of heritage buildings should be further considered	Retention of the heritage listed buildings, with integration into the scheme should be the intent with justification provided where this goal is not achieved. Building retention and integration into the future built form	The archaeological salvage of the majority of the remaining heritage items on the MPW site and removal of existing infrastructure including buildings with some residual salvage undertaken as part of Stage 2 of the MPW Project, is approved under the MPW Concept Approval. A Construction Heritage Management Plan would be developed as part of the CEMP for Early Works in consultation with relevant agencies and stakeholders to manage this process during construction. The Amended	N/A

Issue	Comment	Response	Reference
	should be detailed in the Heritage Management Plan for the site.	<p>Modification Proposal does not seek to alter the heritage salvage works approved in the MPW Concept Approval, to be undertaken as part of Early Works.</p> <p>A European heritage interpretation strategy would be developed in close consultation with local historical societies, former and current staff and military personnel which would be implemented during Early Works to further manage impacts to non-Indigenous heritage.</p>	
Consultation with agencies should be carried out for heritage regarding the modification proposed	Agency consultation should be undertaken to verify the appropriateness of the proposed modifications in the context of the heritage setting, with agency responses considered prior to determination.	<p>Agency consultation was undertaken on numerous occasions throughout the approvals process for the MPW Concept Approval, and they have had the opportunity to comment in the proposed modifications through the public exhibition process.</p> <p>The Amended Modification Proposal would not result in any additional impacts to heritage items from those approved under the MPW Concept Approval. Consultation with relevant agency stakeholder groups was undertaken as part of the exhibition/public notification period as required under s96(2) of the EP&A Act. Further consultation would be undertaken as necessary in relation to future development stages.</p> <p>Further agency consultation has also been undertaken as part of the MPW Stage 2 Proposal, in which the importation of fill is to be undertaken (refer to Section 6 of the MPW Stage 2 EIS).</p>	Section 6 of the MPW Stage 2 EIS

Indigenous heritage

Issue	Comment	Response	Reference
Limited information provided	Limited information has been provided to determine the level of interaction between the proposed modification works and the identified Aboriginal sites. The Memorandum is also particularly absent of any discussion of how works within site MA5 have changed and how these changes interact with identified features of the registered site.	<p>An assessment of impacts to Indigenous heritage from the Modification Proposal including impacts to MA5 has been detailed within Section 5.7 of the MPW Concept Modification Report. The assessment identified that the MPW Concept Modification Proposal would result in no net increase of impacts to Indigenous heritage items from those identified and assessed for the approved Early Works under the MPW Concept Approval.</p> <p>An assessment of the potential Indigenous heritage impacts of the Amended Modification Proposal, in consideration of those assessed for the MPW Concept Approval was included in Section 7.1 of the MPW Concept Modification RtS. The assessment identified that the Amended Modification Proposal would not result in additional impacts to</p>	<p>Section 5.7 of the Modification Report</p> <p>Section 7.1 of the MPW Concept Modification RtS</p>

Issue	Comment	Response	Reference
		<p>Indigenous heritage above those identified in the MPW Concept Approval.</p> <p>As outlined in the REMMs identified with the MPW Concept Approval, during detailed design / Early works, an archaeological salvage excavation program would be implemented to preserve archaeological deposits of moderate to high archaeological/scientific significance located within the construction footprint (items recorded at MA5 and MA9). Consideration would be given to conserving both sites in situ, within open space reserves, or as an extension of the proposed conservation zone.</p>	
Lack of consultation for proposed modification works	<p>There has been no consultation undertaken with the relevant Aboriginal community representatives to detail and discuss the proposed modification. Despite the lack of impact as a result of the project footprint, other changes as a result of the modification may result in increased impacts on the heritage significance of the surrounding environment such as changing the heights of stockpiling or undertaking activities which change the acoustic environment. This approach is inconsistent with the relevant heritage guidelines, specifically the <i>Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales</i> (DECCW, 2010). Here it is defined that consultation should be undertaken where “<i>there is uncertainty about potential harm to Aboriginal objects and Aboriginal Places</i>” (DECCW, 2010).</p>	<p>The construction activities required to import additional fill would be undertaken during the MPW Stage 2 Proposal as part of the Amended Modification Proposal (refer to Section 6 of the MPW Concept Modification RtS). All known Aboriginal heritage impact management works would be undertaken during Early Works. Indirect impacts to Aboriginal Heritage items outside of the Early Works footprint have been assessed, in consultation with RAPs, as part of the MPW Stage 2 EIS with mitigation and management measures proposed (refer to Section 12).</p> <p>As per the relevant heritage guidelines, consultation with Representative Aboriginal Parties (RAPs) was not undertaken as there would be no increase to impacts to Aboriginal heritage items for the Amended Modification Proposal, from those assessed for Early Works, (refer to Section 7 of the MPW Concept Modification RtS).</p>	Section 6 of the MPW Concept Modification RtS

Biodiversity

Issue	Comment	Response	Reference
Lack of mitigation measures prescribed for mobile fauna impact	The Modification Report identifies that the proposal would result in an increase in the number of truck movements through the site increasing the risk of impact on mobile fauna. There does not however, appear to be any response to this increase in the mitigation measures proposed. An increase in the risk to fauna should result in an increase in mitigation of mobile fauna through methods such as animal exclusion fencing, driver education during inductions and the use of signage.	The Amended Modification Proposal, as described in Section 6 of the MPW Concept Modification RtS, would result in no additional impacts to mobile fauna from what was assessed for the approved Early Works, as the importation of fill is proposed to be undertaken during the MPW Stage 2 construction. Potential impacts to mobile fauna generated by the Amended Modification Proposal would be considered during the staged development for Stage 2 of the MPW Project. Mitigation measures outlined in Section 22 of the MPW Stage 2 EIS are considered adequate to mitigate this potential impact.	Section 22 of the MPW Stage 2 EIS Section 6 of the MPW Concept Modification RtS,
Lack of clarity over assessment methods	The Assessment does not discuss if the proposed increased risk to mobile fauna and potential edge effects will result in changes to the early works being required to be assessed under the <i>NSW Framework for Biodiversity Assessment</i> (FBA). Assessment under the FBA is currently not required for the early works however, the modification will result in an increase in impacts on ecology. This Assessment should be modified to discuss if consideration under the FBA is now required and justify why if not, so that the impacts on ecology can be fully assessed.	The Amended Modification Proposal is a modification to the MPW Concept Approval and no longer seeks to modify Early Works for the importation and placement of clean general fill. The importation and placement of clean general fill would be undertaken during Stage 2 of the MPW Project. The biodiversity impacts assessed for Early Works within the MPW Concept Approval (i.e. MPW Concept Approval BAR) would therefore not change under the Amended Modification Proposal.	Section 6 of the MPW Concept Modification RtS

Waste and Resource Management

Issue	Comment	Response	
Life cycle consideration within design and materials selection	Assess the project's operational life including consideration of embodied energy and an end of life strategy in the form of a deconstruction plan that identifies potential future site uses and uses for components on and off site.	Activities proposed within the MPW Concept Modification Proposal and subsequent Amended Modification Proposal (refer to Section 6 of the MPW Concept Modification RtS) have been assessed in accordance with the MCoA and revised SEARs for the Project (SSD 5066). The re-use of plant, equipment and materials at the Project's end-of life is considered outside the scope of the Amended Modification Proposal assessment.	Section 6 of the MPW Concept Modification RtS
Waste management strategy to ensure compliance with waste hierarchy	Develop a WMS encompassing the MPW Project and incorporating an integrated waste management system to ensure the project complies with the waste hierarchy of avoidance, recovery, reuse and recycle prior to disposal.	As outlined in the MPW Concept EIS (refer to Section 26.3), a waste management plan would be prepared as part of an overall CEMP for each construction stage of the MPW Project, including Early Works. This would implement key principles of relevant waste guidelines, and the waste management hierarchy of reduce, reuse, recycle and recover. Mitigation measures proposed in Section 8 of the MPW Concept Modification RtS relating to waste, including preparation of a Waste Management Plan, would remain relevant for Amended Modification Proposal.	Section 26.3 of the MPW Concept EIS Section 8 of the MPW Concept Modification RtS
Classification and recording of demolition waste	Demolition and construction waste is to be classified and recorded in accordance with <i>NSW Waste Classification Guidelines</i> (EPA, 2014) throughout the construction process so that the overall waste diversion performance achieved can be quantified.	As outlined in Section 3.2.4 of the MPW Concept Modification Report, and prescribed in the MCoA's (B14 - SSD 5066), construction and demolition material requiring disposal is to be subject to waste classification under the <i>Waste Classification Guidelines 2014</i> (NSW EPA, 2014) and would be disposed of at an appropriate licensed facility. This requirement would be included within respective Waste Management Plans to be prepared for Early Works and MPW Stage 2 CEMPs.	Section 3.2.4 of the MPW Concept Modification Report
Offsite disposal of contaminated waste	Any contaminated fill material identified that is deemed unsuitable for reuse will need to be transported and disposed of at a licensed waste receiving facility in accordance with	Offsite disposal of material deemed unsuitable for re-use, either geotechnically unsuitable or contaminated materials, has been outlined procedurally in the Preliminary RAP prepared for the MPW Concept Approval (refer to Appendix F, Technical Paper 5). This procedure would include that the removal and disposal of contaminated material be undertaken by suitably qualified persons, directed to a waste	Section 6 of the MPW Concept Modification RtS

Issue	Comment	Response	
	the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> .	management facility or premises lawfully permitted to accept the material.	
Waste tracking and monitoring process	Identify a waste tracking, auditing, assessment and project review process that is continually undertaken through the project lifecycle.	The Amended Modification Proposal included in the MPW Concept Modification RtS includes importation of fill as an activity included as part of the MPW Stage 2 Proposal, rather than Early Works as proposed in the MPW Concept Modification Report. Waste tracking and auditing would be undertaken during Early Works and MPW Stage 2 as required in accordance with the CoA's for the MPW Project.	Section 6 of the MPW Concept Modification RtS