

Environmental Assessment Report

23 Scrivener Street, Warwick Farm

Modification to Project Application No. 08_0088

Submitted to
NSW Department of Planning
On Behalf of Independent Print Media Group Pty Ltd

September 2009 ■ 09198

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This report has been prepared by: Michael Rowe

Signature



Date 01/09/09

This report has been reviewed by: Vivienne Goldschmidt

Signature



Date 01/09/09

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Statement of Validity

Environmental Assessment

This Environmental Assessment has been prepared and submitted under Part 3A of the *Environmental Planning and Assessment Act*, 1979 (as amended) by:

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Project Summary

Applicant	Independent Print Media Group Pty Ltd 83 O'Riordan St, Alexandria 2015
Land to be developed	23 Scrivener Street, Liverpool and land in the adjacent South Sydney Freight Line rail corridor
Proposed development	Laying of a new rail track from the South Sydney Freight Line to the IPMG printing facility, and modification of the existing railway siding on IPMG's land.

Declaration

I certify that the following Environmental Assessment Report has been prepared in accordance with the requirements of Part 3A of the *Environmental Planning and Assessment Act*, 1979 and Regulation and that, to the best of my knowledge, is not false or misleading.

Signature:



Name: Vivienne Goldschmidt

Date: 1st September 2009

Executive Summary

This Environmental Assessment Report for modifications to the approved Independent Media Group Pty Ltd (IPMG) printing facility at Warwick Farm is submitted to the Minister for Planning in accordance with Section 75W of the *Environmental Planning and Assessment Act 1979*.

The 7.938 hectare IPMG site is located at 23 Scrivener Street in an industrial area at Warwick Farm in the Liverpool Local Government Area. The area of the South Sydney Freight Line (SSFL) included as part of this modification application runs adjacent to the western boundary of the IPMG site and to the rear of six properties to the north.

The proposed works involve the laying of a new rail track (a spur line) from the SSFL - currently under construction - to the new printing and warehousing facility, and modification to the existing railway siding on IPMG's land.

The assessment of the modifications has demonstrated that the proposed changes will have no impacts that can not be managed in particular those related with noise and vibration. The proposed modifications do not change the approved Project Application and are consistent with the objectives of relevant statutory plans.

A Statement of Commitments has been prepared to manage construction and on-going environmental impacts. The environmental assessment addresses the Director General's Requirements and demonstrates the impacts of the proposal can be satisfactorily managed and therefore the modifications should be approved.

1.0 Background

This Environmental Assessment Report for modifications to the approved Independent Media Group Pty Ltd (IPMG) printing facility at Warwick Farm is submitted to the Minister for Planning in accordance with Section 75W of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The project was approved by the Minister for Planning under Section 75J of the Act on 24 March 2009 subject to a series of conditions (Application 08_0088).

The approved development involved the modification, refurbishment and extension of an existing manufacturing plant into a new 40,000 square metres facility for printing, warehousing and distribution at 23 Scrivener Street Warwick Farm.

This report has been prepared by JBA Urban Planning Consultants Pty Ltd on behalf IPMG based on plans and supporting technical information provided by Aurecon. The report describes the proposed modifications and the reasons they are required, and includes an assessment of the proposal in accordance with the Director-General's Requirements (**Appendix A**). It should be read in conjunction with the appended supporting plans and reports.

1.1 Overview of modification

The works the subject of this modification were flagged in the Environmental Assessment Report prepared by JBA (November 2008) and are consistent with the existing approval. They constitute one of IPMG's commitments in relation to environmentally sustainable development, as they will facilitate a significant reduction in truck movements to and from the site.

The works involve the laying of a new rail track (a spur line) from the South Sydney Freight Line (SSFL) - currently under construction - to the new printing and warehousing facility, and modification of the existing railway siding on IPMG's land. The details are set out in **Section 2.0** of this report and shown on the engineering drawings prepared by Aurecon at **Appendix B**. Other works to facilitate the operation of the railway siding were approved as part of the above approval.

The SSFL is being constructed by the Australian Rail Track Corporation (ARTC), the rail authority for this rail corridor, on land owned by RailCorp. The SSFL will provide a dedicated freight line allowing freight services to operate independently of passenger services for a distance of 36 kilometres between Macarthur and Sefton in southern Sydney. IPMG will be constructing the spur line on RailCorp's land on behalf of ARTC. The rest of the line and the siding will be on IPMG's land.

1.2 The site and environs

The 7.938 hectare IPMG site is located at 23 Scrivener Street in an industrial area at Warwick Farm in the Liverpool Local Government Area as shown in **Figure 1**. The site has a 350m frontage to the SSFL. The IPMG site currently has two parallel sidings running the length of the site with a 20m long loco head shunt (or wagon shunt) at the northern end. The existing sidings have been disconnected from the RailCorp network for over 10 years. The site is about 2m lower than the existing RailCorp rail lines.

The area of the SSFL included as part of this modification application runs adjacent to the western boundary of the IPMG site and to the rear of the six properties to the north as shown in **Figure 2**.

A number of *Acacia pubescens* and other remanent vegetation are located along the boundary of the IPMG site and SSFL.

Surrounding uses include a range of large industrial operations, light industrial units, and residences and stables associated with Warwick Farm Racecourse. The three properties (17-21 Manning Street) to north of the site, and to the east of the railway line, are the closest properties to the proposed development. 21 Manning Street, the closest property, and 17 Manning Street are currently unoccupied and have no horses stabled. 19 Manning Street is occupied and has horses stabled on the site on an occasional basis.



Figure 1 – Locality Plan



Figure 2 – Surrounding Uses

1.3 Landownership and zoning

Landownership

The proposed works will occur on land owned by IPMG and in the rail corridor of the Main Southern Railway owned by RailCorp as shown in **Figure 3**. The land is legally described as follows:

- IPMG land: Lot 1 in DP 774089;
- RailCorp land: land vesting in the Rail Corporation of New South Wales *vide* Section 11 of the *Government Railways Act 1912* being adjacent to Lot 1 in DP 774089 and Lots 4-9 in DP 758620.

RailCorp has provided landowner's consent (see **Appendix C**).

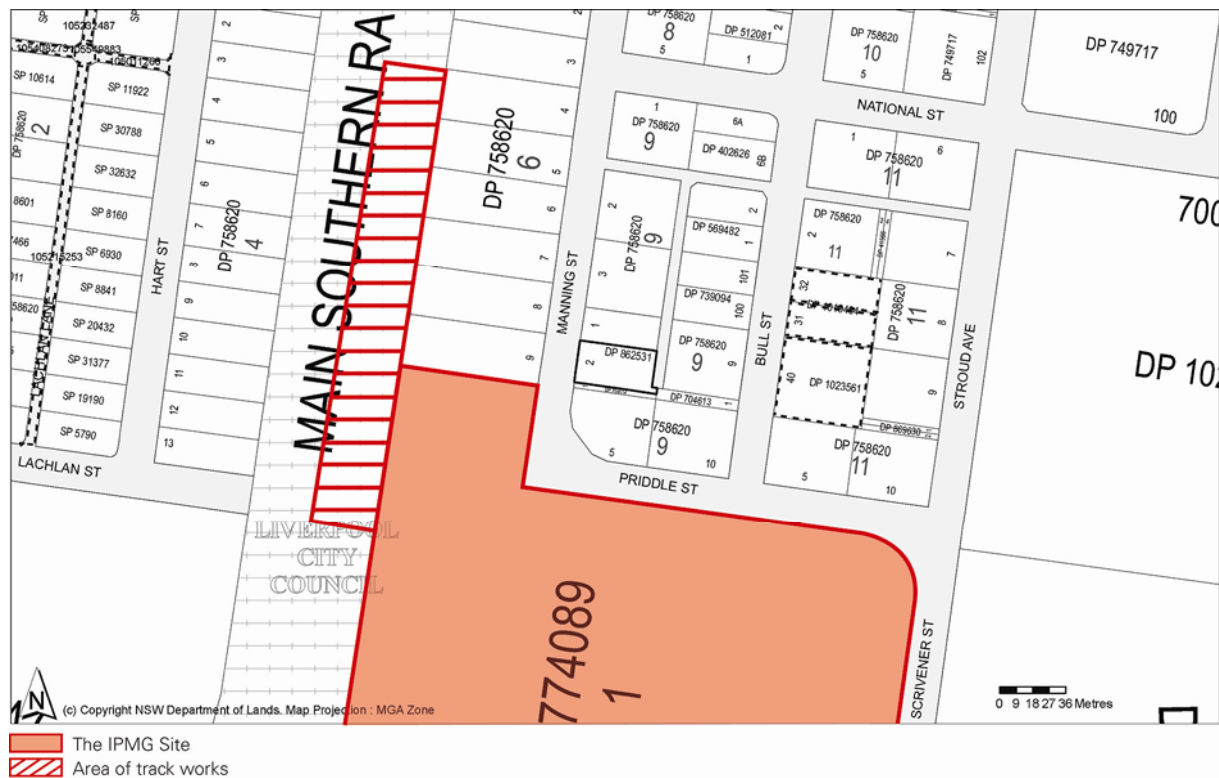


Figure 3 – Landownership

Zoning and permissibility

The IPMG site is zoned IN1 General Industrial under Liverpool Local Environmental Plan 2008 (see **Figure 4**). The proposed new rail track (spur line) and railway siding is ancillary to the dominant uses being printing (industrial), warehousing and distribution. Industries, warehouses and distribution centres are all permissible with consent in the IN1 zone; accordingly the proposed development is permissible.

In addition, pursuant to clause 81(a) of State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP) development for rail freight sidings may be carried out by any person with consent on land in a prescribed zone. Under clause 78 of the Infrastructure SEPP the IN1 General Industrial Zone is a prescribed zone.

The Main Southern Railway is zoned SP2 Infrastructure (Railway) under Liverpool Local Environmental Plan 2008 (see **Figure 4**). The proposed works are permitted with consent. Notwithstanding this, pursuant to clause 79(2)(a) of the Infrastructure SEPP, “development for the purposes of rail infrastructure facilities may be carried out by or on behalf of a public authority without consent on any land”. Under clause 78 of the Infrastructure SEPP rail infrastructure includes railway tracks and associated track structures.

Based on the provisions of the Infrastructure SEPP consent would not be required for the works being undertaken on behalf of ARTC. However pursuant to section 75B(3) of the EP&A Act regarding related development, if only part of a development is a project to which Part 3A applies, then the other parts are taken to be a project to which this part of the Act applies. Accordingly, all the works will be subject to the provisions of Part 3A.

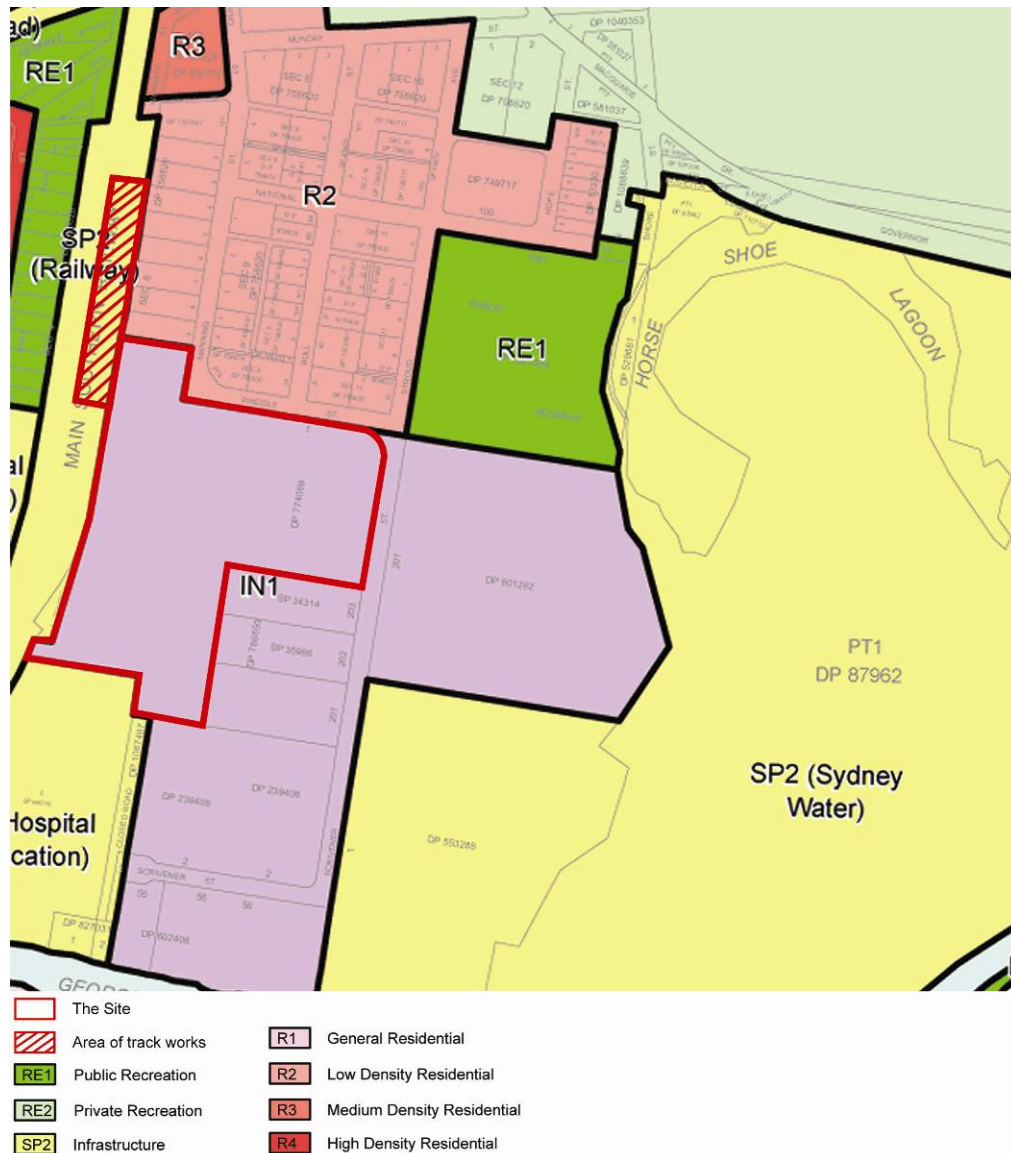


Figure 4 – Zoning

1.4 Planning framework

This section sets out the environmental planning instruments (EPI) relevant to the proposed modification. An assessment of compliance with relevant controls is summarised in **Section 3.2** of this report.

Greater Metropolitan Regional Environmental Plan No. 2 Georges River Catchment

The plan aims to maintain and improve the water quality and river flows of the Georges River and its tributaries through a consistent and coordinated approach to environmental planning and assessment for land within the catchment. The plan sets out general principles and identifies specific matters for the consent authority to take into consideration when determining an industrial development application. Appropriate water management measures will be adopted as detailed in **Section 3.5** and **Attachment B** to ensure the proposed modification will not impact on the Georges River and its tributaries.

State Environmental Planning Policy No 33 – Hazardous and Offensive Development

SEPP 33 aims to ensure that when a consent authority is considering an application to carry out potentially hazardous or offensive development, the consent authority has sufficient information to assess whether the development is hazardous or offensive and to impose conditions to reduce or minimise any adverse impact. SEPP 33 did not apply to the approved Project Application as it was not considered a hazardous or offensive development. The proposed modifications do not change this situation.

State Environmental Planning Policy 55 – Remediation of Land

SEPP 55 provides a State-wide planning approach to the remediation of contaminated land in order to reduce the risk of harm to human health or the environment. The SEPP defines when consent is required for remediation work, and requires that remediation work meets certain standards and notification requirements. The Environmental Site Assessment undertaken for the site concluded that the site is suitable for continued industrial use. The proposed modifications do not change this situation.

State Environmental Planning Policy (Infrastructure) 2007

The aim of the Infrastructure SEPP is to facilitate the effective delivery of infrastructure across the State.

As explained in **Section 1.3** pursuant to clauses 81(a) and 79(2)(a) of the Infrastructure SEPP, development for rail freight sidings may be carried out by or on behalf of a public authority without consent. Therefore based on these provisions, consent would not be required for the works being undertaken on behalf of ARTC. However, pursuant to section 75B(3) of the EP&A Act regarding related development, if only part of a development is a project to which Part 3A applies, then the other parts are taken to be a project to which this part of the Act applies. Accordingly, all the works will be subject to the provisions of Part 3A.

Clause 85 of the SEPP requires the relevant rail authority to be notified for development immediately adjacent to rail corridors, if the development:

- is likely to have an adverse effect on rail safety, or
- involves the placing of a metal finish on a structure and the rail corridor concerned is used by electric trains, or
- involves the use of a crane in air space above any rail corridor.

The proposed works are not expected to trigger Clause 85, however the rail authority will be notified.

Under Clause 104 the Roads and Traffic Authority (RTA) is made aware of all traffic generating development identified in Schedule 3 of the SEPP and is given the opportunity to provide comment. As the proposed modifications will not result in an enlargement or extension of the existing premises referral to the RTA is not required.

Liverpool Local Environmental Plan 2008

This LEP applies to the Scrivener Street site and the rail corridor, which are zoned IN1 General Industrial and SP2 Infrastructure (Railway) respectively. The IN1 zone provides for a wide range of industrial and warehouse land uses. The SP2 zone provides for development that is ordinarily incidental or ancillary to the dedicated Railway purpose such as the spur line proposed as part of this modification. As explained in **Section 1.3** the proposed development is permissible within each zone.

2.0 Description of proposed modifications

The proposed modifications to the approved project are described below and illustrated on the engineering plans at **Appendix B**.

2.1 Overview

In accordance with the commitments made in relation to the approved project, IPMG intends to use the SSFL to transport paper from Port Kembla to the Warwick Farm printing facility, so removing (6) B-doubles movements per day or 42 per week.

IPMG will process up to 135,000 tonnes of paper through the Warwick Farm facility per year. Most of the raw material, which is packed onto bolsters, is shipped on roll-on-roll-off ships from local and overseas paper mills to Port Kembla. Under the proposal a dedicated IPMG train will proceed from Port Kembla via the Illawarra Line, and the Sydney Metropolitan Freight Network to Chullora, and thence via Sefton onto the new SSFL. It will exit the SSFL line at a new set of points to be located south of Warwick Farm station and enter the site from the north.

Upon arrival at the site the train will enter the IPMG building where the raw materials will be unloaded internally. Once unloading is completed the train will then depart the site and return to Port Kembla for reloading.

2.2 Need for the proposal and alternatives considered

The need for the works was flagged in the Environmental Assessment Report (MP No. 08_0088) and constitutes one of IPMG's commitments in relation to ESD. The proposal will facilitate a significant reduction in the use of trucks to transport raw paper to the site and signifies a substantial financial investment on the part of the proponent to the environmental sustainability of this printing facility.

The alternative form of transport would be via road, this would remove the opportunity to reduce truck movements by the equivalent of six (6) B-doubles per day or 42 per week, as well the associated air quality benefits. There are no other alternatives to train operations as the SSFL is the only freight rail line which will have immediate access to the site. Shipping the raw material from Port Kembla to an intermodal freight terminal by train and then by truck to the site would involve significant double handling and is neither cost effective or as environmentally sustainable as the proposal.

Alternative hours of operation were considered. The proposed hours reflect the operational exigencies of the rail network and Pacific National, and consider the amenity of nearby residential/stable properties.

2.3 The proposal

2.3.1 Proposed works

The following physical works are proposed to allow trains to enter the IPMG facility via the SSFL (see **Figure 5**). Detailed drawings of the proposed track works including drainage and utilities works are shown on the engineering drawings prepared by Aurecon at **Attachment B**.

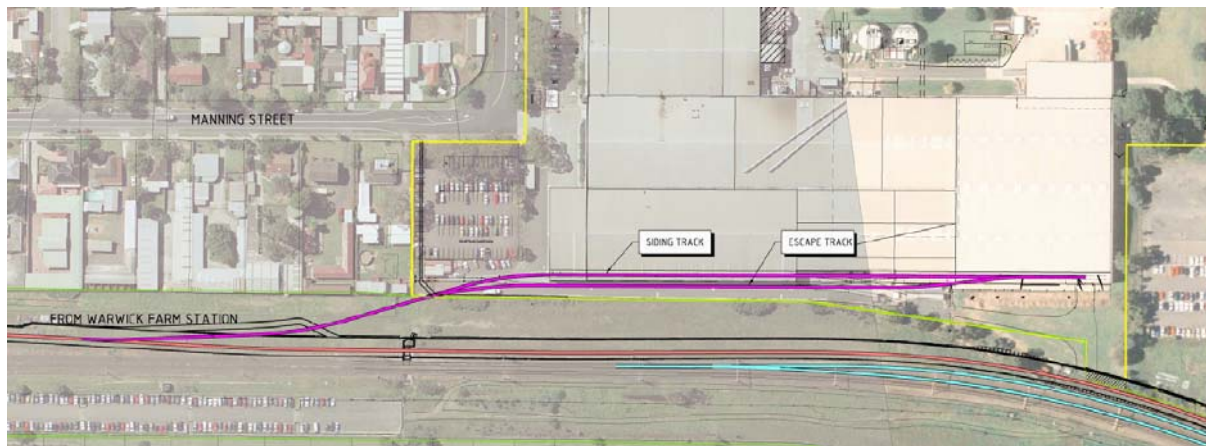


Figure 5 – Overview of proposed works

Rail corridor

It is intended to construct 150m of new track on RailCorp land connecting the SSFL to the boundary of the IPMG site.

The track has been positioned to avoid existing vegetation in the rail corridor near the IPMG boundary. At its nearest point the new track siding will be 6.5m from the vegetation which is fenced as a 'significant environmental area'.

A rail signal will be located at the proposed SSFL turn out.

IPMG land

The proposed rail siding will enter the site at the north western corner and connect to the existing internal shunt line. A 5m long motorised sliding gate is proposed at the rail entry to the site in order to prevent entry into the rail corridor. The gate will trigger a warning bell and lights when closing, and will be linked to the signal and turn out to the SSFL.

The siding leads to two loading docks connected with crossover tracks to the external escape track. The existing crossover will be removed and a straight connection installed. The two existing lines will be connected to create a new longer single loading dock. A new trailing turn-out on the main siding track will be constructed to allow the diesel engine car to park clear of the turn-out.

Where possible the existing external track within the site will be re-used. The new track at the southern end of the escape track will be constructed as an encased concrete slab, while the new track to the north of the factory building will all be constructed as a conventional sleepers track.

2.3.2 Type and number of trains

The dedicated IPMG train, to be operated by Pacific National, will contain a maximum of 17 container wagons. Each wagon is capable of carrying 2 bolsters of up to 21.3 tonnes of paper per bolster, resulting in a total of 724 tonnes of paper per trip. In total, 260 train trips per annum or roughly 5 trips per week on average are forecast to use the line.

The number of IPMG dedicated trains per day travelling to the site via the SSFL and various other lines is shown in **Table 1**. The table demonstrates that the IPMG train movements will constitute less than 10% of all daily usage on the SSFL, the Illawarra Line and the Sydney Metropolitan Freight Network. It should also be noted that by 2018 the SSFL is expected carry up to 62 movements per day.

Table 1 – Daily train movements

Train line	All daily train movements	Projected daily IPMG trains	
		Movements	Percentage
SSFL	27	2	7.4%
Illawarra line	28	2	7.1%
Sydney Metropolitan Freight Network	110	2	1.8%

Source: RailCorp Ministerial Report and Halcrow MWT

2.3.3 Control of the track

Entry and exit of the train between the IPMG site and SSFL will be controlled by the ARTC operations centre in Junee. The control will be communicated via a signal located at the turn out on the SSFL. Catch points will be constructed in the turn-out near the entrance to the SSFL to prevent trains from entering the main line against the signal. The turn-outs from the siding track at each end of the escape track within the IPMG site will be manually operated.

2.3.4 Arrival and departure procedure

As explained in **Section 2.1** the IPMG train will travel from Port Kembla via the Illawarra and the Metropolitan Freight lines before joining up at Sefton and proceeding south along the SSFL line. The train will depart the SSFL approximately 150m south of Warwick Farm Station at 15km per hour via a spur line owned and operated by ARTC and enter the IPMG site at the north western corner through a sliding gate activated in conjunction with the turnout signal off the SSFL.

Upon entering the site the train will slow to 5km per hour and utilise the existing IPMG siding to travel into the building under the existing awning, before stopping approximately 55 metres from the southern end of the internal siding.

The locomotive will disconnect from the train and proceed forward past a set of internal turn out points to exit the southern warehouse and proceed via the external run around line to the opposite end of the parked incoming wagons. The locomotive will re-couple with the train and move the wagons into the warehouse where they will be unloaded.

After the unloading process has been completed and the driver has received authority to depart, the train will leave the building to the north through the open boundary gate at 5km per hour onto the track connecting to the SSFL. Once the last wagon of the train has moved from the site the gate at the boundary automatically closes. The train will then proceed back to Port Kembla for reloading.

Drivers will observe standard operating procedures and use appropriate train management techniques between arrival at, and departure from, the siding to minimise train generated noise. The rail operator, Pacific National, will develop site specific procedures as part of its service implementation and risk assessment process.

2.3.5 Hours of operation

The trains are expected to arrive at the IPMG facility between 6:00am and 7:00am and depart between 3:00pm and 4:00pm. The unloading of raw materials from the trains will take place inside the facility between these times.

3.0 Environmental Assessment

This section of the report assesses the proposal in accordance with the Director-General's Environmental Assessment Requirements. The table below indicates the location in this report where each requirement is addressed. A copy of the Director-General's Environmental Assessment Requirements is included at **Attachment A**.

3.1 Director General's Environmental Assessment Requirements

Director-General's Requirements	Report location
Description of proposed modifications	Section 2.3
Need for the proposal	Section 2.2
Alternatives considered	Section 2.2
Consideration of relevant statutory provisions	Section 3.2
Overview of environmental impacts and detailed assessment of key issues	Section 3
Statement of Commitments	Section 4.1
Statement of Validity	Page iii
Executive Summary	Page 1
Key Issues	
Noise	Section 3.4 and Appendix D
Soil and Water	Section 3.5
Rail Traffic	Section 3.6 & 2.3.2
Flora and Fauna	Section 3.7 and Appendix E
Visual Impact	Section 3.8
Consultation	Section 3.9

3.2 Consideration of relevant statutory plans

Table 2 - Compliance with relevant statutory plans

Instrument/ strategy	Comments
GMREP No. 2	The proposed modifications will not affect the Georges River and its tributaries.
SEPP 55	The Preliminary Environmental Site Assessment undertaken for the approved project concluded that the site is suitable for continued commercial/industrial use subject to further testing of selected items or areas of the site. The proposed modifications do not change this situation.
SEPP 33	SEPP 33 did not apply to the approved project and the proposed modifications will not result in a hazardous or offensive development.
Infrastructure SEPP	The project will be referred to RailCorp in accordance with the SEPP.
LEP 2008	The proposed modifications are permissible in the zones.

In accordance with the NSW Government's 'Industrial Noise Policy' (INP) a survey to quantify and characterise the existing ambient noise environment immediately surrounding the site was carried out at two locations. The measured ambient noise levels for the receptors in the south west corner of the site and on Manning Street are shown in **Table 3**.

Table 3 - Ambient noise levels for the receptors

Receptor Location	Daytime 7am – 6pm		Evening 6pm – 10pm		Night-time 10pm – 7am	
	RBL	LAeq	RBL	LAeq	RBL	LAeq
1. South western corner of the site	45	62	48	63	46	63
2. Manning Street	43	65	41	61	37	59

Source: Heggies

3.4.2 Impact Assessment

Construction Noise

On the basis of the proposed construction methodology the following scenarios have been used in the assessment of construction noise impacts:

- Scenario 1 - Excavation and Breaking Concrete;
- Scenario 2 - Compaction/Capping Layer Preparation; and
- Scenario 3 - Track Laying/Installation and Concrete Works.

The predicted typical and worst-case construction noise levels at the nearest potentially affected receiver at 21 Manning Street are presented in **Table 4**.

Table 4 – Predicted noise levels at nearby receiver at 21 Manning Street

Distance of works to receiver	LA ₁₀ Noise Objective (dBA)	Predicted Typical / Worst-Case LA ₁₀ for each Scenario (dBA)		
		Scenario 1	Scenario 2	Scenario 3
20m	53	82/93	77/79	76/81
75m		71/82	65/79	64/81

Source: Heggies

The above predictions indicate that noise levels during typical and worst case construction activities will exceed the background noise objective. However, exceedances of this nature are common on projects involving works in close proximity to sensitive receivers and the noise intensive activities are unlikely to occur on a continuous basis. It should also be noted that the SSFL is currently being constructed immediately adjacent to the western boundary of the IPMG site. The noise impacts from IPMG related construction works would be expected to be comparable to the SSFL works.

Noise generated by construction traffic is expected to be negligible.

Due to the predicted construction noise goal exceedances, the impacts of construction noise at nearby residential receivers will be managed and mitigated through the preparation of a site-specific Construction Noise and Vibration Management Plan (CNVMP) as detailed in **Section 3.4.3** below.

Construction Vibration

The highest vibration impact is likely to occur during 'Scenario 1 - Excavation and Breaking Concrete' (see above). The nearest affected structure is the stable building at 21 Manning Street to the north of the site, approximately 10m away from the construction works. The nearest affected residential structure, also at 21 Manning Street is 20m away from the works and as previously noted, both buildings are currently unoccupied.

In accordance with DECC's 'Assessing Vibration: a Technical Guideline' the safe working distance from a medium hydraulic hammer is 7m for structural damage and 23m for human response. As the nearest effected structure to the construction works is situated approximately 10m away, the construction works are not expected to exceed the structural damage criteria.

The use of a medium hydraulic hammer has the potential to exceed the human comfort vibration criteria. However, this can be managed through the CNVMP which will ensure that when working in proximity to the nearest receiver on Manning Street (northern end of the works), equipment will be carefully selected to reduce the potential vibration impact (for example by using a smaller excavator) insofar as possible.

Operational Noise

The noise assessment was undertaken in accordance with the requirements of the DECC's 'Interim Guideline for the Assessment of Noise from Rail Infrastructure Projects' (IGANRIP) and Industrial Noise Policy (INP). For redevelopment of existing rail lines the IGANRIP residential noise trigger levels during the day are 65LAeq (15 hour) and 85LAm_{ax}, and at night are 60LAeq (9 hour) and 85LAm_{ax}.

In order to assess the operational noise emissions for the IPMG rail sidings, three noise modelling scenarios have been considered:

- Scenario 1 - Existing Situation (2008): RailCorp Passenger Trains.
- Scenario 2 – Future Situation A (Project Opening and Year10): RailCorp Passenger Trains plus SSFL Freight Trains.
- Scenario 3 - Future Situation B (Project Opening and Year 10): RailCorp Passenger Trains plus SSFL Freight Trains plus IPMG Freight Trains.

Using the above scenarios, noise levels have been predicted at 21 Manning Street as the nearest potentially affected sensitive receiver to the IPMG rail siding. The results are presented in **Table 5**.

Table 5 – Operational Noise Emissions at 21 Manning Street

Scenario	dBA		
	LAeq(15hr)	LAeq(9hr)	LAm _{ax}
IGANRIP Residential Noise Trigger Levels	65	60	85
Scenario 1 – Existing (dBA)	56	53	78
Scenario 2 – Future A (dBA)	60	59	86
Scenario 3 – Future B (dBA)	60	59	86

Source: Heggies

The above results indicate that the combined operations of the IPMG rail siding together with RailCorp's passenger line and the SSFL (Scenario 3) would not increase the future LAeq(15hour), LAeq(9hour) or the LAm_{ax} noise levels compared to the operation of RailCorp's passenger line and the SSFL (Scenario 2). When taking the above into consideration, the results presented in **Table 5** are predicted to comply with the residential IGANRIP trigger levels.

Furthermore, **Table 6** demonstrates the noise levels resulting from on-site operations at 21 Manning Street are predicted to comply with the appropriate INP noise goal.

Table 6 – Operational Noise Emissions

INP Corrected Noise Goal LAeq(15min) (dBA)	Predicted Noise Level LAeq(15min) (dBA)
63	63

Source: Heggies

As the proposal complies with the relevant DECC noise criteria and as there is no increase in future LAeq(15hour), LAeq(9hour) or L_Amax noise levels as a result of the project, there is no need for any operational noise mitigation measures.

Operational Vibration

The Vibration Dose Values calculated for the nearest residential receiver located on Manning Street demonstrates that the proposed modification will comply with the 'preferred' daytime and night-time criteria.

Cumulative Noise Impact

As the rail traffic generated by the project was not considered during the Environmental Assessment for the South Sydney Freight line, DECC requested that if necessary, an assessment of the cumulative noise impact be prepared.

The criterion for determining whether a cumulative rail noise assessment is necessary is based on whether the project related rail traffic would represent 10% of the total line/corridor rail traffic. As demonstrated in **Table 1** the IPMG trains constitute a very small proportion of movements and are well below the 10% threshold, therefore a cumulative rail noise assessment was not necessary.

3.4.3 Management

Construction and Vibration

IPMG will prepare and implement a site-specific Construction Noise and Vibration Management Plan including the following measures to minimise the potential noise and vibration impacts:

- Noise and vibration intensive construction works will be carried out during normal construction hours wherever practicable. Where works involving the operating line need to be carried out during track possessions, noise intensive activities will be scheduled to occur during the daytime, where possible.
- Quietest available plant suitable for the relevant tasks will be used.
- Diamond cut saws will be used instead of jackhammers where concrete cutting is required.
- The duration of noise and vibration intensive activities will be minimised insofar as possible.
- Where feasible and reasonable, site hoardings or temporary noise barriers will be used to provide acoustic shielding of noise intensive activities.
- If rock breakers are required they will be of the 'Vibro-silenced' or 'City' type, where feasible and reasonable.
- Activities resulting in highly impulsive or tonal noise emission (eg rock breaking) will be limited to 8 am to 12 pm Monday to Saturday and 2 pm to 5 pm Monday to Friday (except where essential during track possessions) or when otherwise approved.

- Noise generating plant will be orientated away from sensitive receivers, where possible.
- Notification will be provided to residents advising them of the nature and timing of works, contact number and complaint procedures.
- Noise and vibration monitoring will be carried out to confirm that noise levels do not significantly exceed the predictions and that noise levels of individual plant items do not significantly exceed the levels shown in Table 4 of the Noise Report.
- Deliveries will be carried out within standard construction hours.
- Non-tonal reversing beepers or equivalent will be fitted and used on all construction vehicles and mobile plant regularly used on site and for any out of hours work.
- Trucks will not be permitted to queue near residential dwellings with engines running.

3.5 Soil and Water

The drainage control measures that will be implemented to manage sediment and erosion impacts from the proposed modification are shown on Drawings DR-010, DR-011 and DR-015 at **Appendix A**.

The tracks will drain to an existing 1200 diameter stormwater drain that crosses the IPMG site along the northern boundary. This culvert also drains the rail corridor in the area where the siding track passes prior to its entry into the IPMG site. The existing drainage on the north and west sides of the building where the railway connection is proposed will not be changed.

3.6 Rail Traffic

As demonstrated in **Section 2.3.2** the proposed modification will contribute approximately two movements per day to the SSFL, Illawarra line and Sydney Metropolitan Freight Network. These movements represent a very small percentage of the overall usage of the rail lines.

Discussions with Pacific National (see **Appendix G**) have demonstrated there is existing capacity on the lines to accommodate the IPMG trains.

3.7 Flora and Fauna

In accordance with the DGRs a Flora and Fauna Assessment was undertaken by Eco Logical and is located at **Appendix E** with the findings and conclusions summarised in this section of the EAR.

3.7.1 Existing Conditions

The majority of the study area consists of exotic groundcover and low shrub species with taller shrubs present only within isolated patches close to the boundary between the rail corridor and the IPMG site.

The field survey found that the study area is highly modified as a result of previous clearing and ongoing maintenance within the rail corridor and does not contain vegetation representative of any communities listed on the *Environment Protection and Biodiversity Conservation Act* (EPBC Act) and *Threatened Species and Conservation Act* (TSC Act).

A total of 36 fauna species were identified in the study area, including 8 native and 28 exotic species. One of these flora species, *Acacia pubescens*, is listed as vulnerable on the EPBC Act and TSC Act. The clumps of *Acacia pubescens* are shown on the Aurecon plans at **Appendix B**.

No threatened fauna species were recorded during the site inspection. Due to the highly disturbed nature of the area and the absence of habitat elements, the study area was considered to represent minimal habitat for common species able to tolerate disturbance.

3.7.2 Impact Assessment

Possible direct and indirect impacts of the proposed modifications were determined to include the following:

- a loss of ground cover and shrub-layer vegetation within the rail corridor;
- increased exposure to wind and light for retained vegetation including *Acacia pubescens*;
- alteration to surface hydrology for retained vegetation including *Acacia pubescens*;
- reduced opportunities for dispersal for retained vegetation;
- sedimentation of surrounding water bodies; and
- spread of weed propagules.

The vegetation which will be directly impacted by the proposed works is limited to exotic groundcover and shrub layer vegetation. No native species, including *Acacia pubescens*, will be removed as part of the proposed works and the clumps of native vegetation will be retained. The exotic vegetation to be removed is not considered to represent significant habitat for any fauna species.

The Significance Assessment under the EPBC Act for *Acacia pubescens* determined that, provided the management measures recommended below are implemented, the species would not be significantly impacted by the proposed modification as:

- all individuals, clumps and stems of this species will be retained;
- the area to be directly impacted is highly modified and supports a large number of exotic species; and
- the proposal will not fragment or disrupt the breeding cycle of the population with the study area.

There are a number of waterbodies surrounding the study area including the Georges River. The potential for impacts to these waterbodies and the sensitive ecosystems they support is considered minimal due to the relatively flat nature of the rail corridor within the study area and separation of the study area from these waterbodies by a relatively large distance including urban and industrial developments. Furthermore, the measures to be implemented in regard to drainage should prevent movement of contaminated soil or water from the study area into surrounding water bodies.

The proposed modification will not involve working in areas which are currently infested by exotic species including the noxious weed, Blackberry, which was identified in the study area.

3.7.3 Management

IPMG will implement the following measures to ensure that impacts to *Acacia pubescens* and other native vegetation and downstream environments are avoided:

- Clumps of native vegetation containing *Acacia pubescens* will be fenced prior to the commencement of any works associated with the proposed modification. No works will be undertaken within the fenced location.
- Drainage control measures, as shown on the Drainage Plan at **Appendix B**, will be in place prior to any construction works commencing. Control measures will be regularly inspected to ensure they are working correctly, particularly following any rainfall events.
- Weed control will be undertaken as part of and following the construction works, including the following:
 - removal of all existing noxious weeds within the study area;
 - destruction of weed material removed from the construction site;
 - washing down vehicles and equipment working in weed infested areas; and
 - management controls, including planting of native species, to prevent establishment of weed species in newly created bare ground.

3.8 Visual Impact

It is considered that the proposal will not have a negative visual impact. The modification utilises a disused track siding into an existing industrial building and does not involve any changes to the structure. The works outside of the IPMG site involve laying at grade tracks located within an existing rail corridor. In terms of trains accessing the site, this use is in keeping with its industrial/rail context of the area and will only occur infrequently.

3.9 Consultation

Government Authorities

IPMG has consulted with RailCorp, ARTC and Pacific National throughout the modification process.

IPMG consulted with the Ministry of Transport's Freight Policy Unit to explain the proposal. The Ministry required that Pacific National confirm that they will be able to gain a timetable (place) to run the train. This confirmation has been supplied at **Appendix F**. The Freight Policy Unit confirmed they were happy with IPMG's approach and that no further consultation was necessary.

Landowner Consultation

IPMG consulted with the owner of 21 Manning St, the nearest affected residential property, to explain the proposed modification including details its location and operation. The owner had no objection to IPMG constructing or operating the line but was concerned that a fence he had planned to construct to the north of his property would have to be pulled down as a result of the IPMG development. As a result IPMG has agreed to construct the fence on the owner's behalf during construction of the rail line.

4.0 Conclusion

The assessment of the modifications has demonstrated that the proposed changes will have no impacts that can't be managed. Specifically those related with construction noise and vibration which will be temporary. The proposed modifications do not change the approved Project Application and are consistent with the objectives of the relevant statutory plans.

4.1 Statement of Commitments

The modification has necessitated additional commitments to be made in order to manage the impacts of the proposal. This Statement of Commitments is to be read in conjunction with the approved Statement of Commitments approved under MP08_0088.

4.1.1 Noise

IPMG will prepare and implement a site-specific Construction Noise and Vibration Management Plan including the following measures to minimise the potential noise and vibration impacts:

- Noise and vibration intensive construction works will be carried out during normal construction hours wherever practicable. Where works involving the operating line need to be carried out during track possessions, noise intensive activities will be scheduled to occur during the daytime, where possible.
- Quietest available plant suitable for the relevant tasks will be used.
- The duration of noise and vibration intensive activities will be minimised insofar as possible.
- Where feasible and reasonable, site hoardings or temporary noise barriers will be used to provide acoustic shielding of noise intensive activities.
- If rock breakers are required they will be of the 'Vibro-silenced' or 'City' type, where feasible and reasonable.
- Activities resulting in highly impulsive or tonal noise emission (eg rock breaking) will be limited to 8 am to 12 pm Monday to Saturday and 2 pm to 5 pm Monday to Friday (except where essential during track possessions) or when otherwise approved.
- Noise generating plant will be orientated away from sensitive receivers, where possible.
- Notification will be provided to residents advising them of the nature and timing of works, contact number and complaint procedures.
- Diamond cut saws will be used instead of jackhammers where concrete cutting is required.
- Noise and vibration monitoring will be carried out to confirm that noise levels do not significantly exceed the predictions and that noise levels of individual plant items do not significantly exceed the levels shown in Table 4 of the Noise Report.
- Deliveries will be carried out within standard construction hours.
- Non-tonal reversing beepers or equivalent will be fitted and used on all construction vehicles and mobile plant regularly used on site and for any out of hours work.
- Trucks will not be permitted to queue near residential dwellings with engines running.

4.1.2 Flora and Fauna

IPMG commits to prevent any impacts to the *Acacia pubescens* or other native vegetation in the area of works or downstream environments through:

- fencing all clumps of native vegetation containing *Acacia pubescens* prior to the commencement of any works associated with the proposed modification;
- implementing the drainage control measures shown on the Drainage Plan at **Appendix B** prior to any construction works commencing; and
- undertaking weed control as part of and following the construction works, including:
 - removing all existing noxious weeds within the study area;
 - destroying all weed material removed from the construction site;
 - washing down vehicles and equipment working in weed infested areas; and
 - planting native species to prevent establishment of weed species in newly created bare ground.

4.2 Reasons why the project should be approved

Approval of the proposed modifications is sought on the grounds that they will:

- satisfy a number of IPMG's obligations under the Statement of Commitments for the approved Project Application;
- improve the operational and environmental efficiency of the approved development;
- remove trucks from local streets, so increasing the safety of trainers and their horses; and
- have no negative visual, construction, or acoustic impacts.

The proposed development will have no negative impacts on the environment, during both construction and operations that can not be managed through the implementation of the Statement of Commitments, and serves the public interest. We therefore request that the Minister approve these modifications.