

5 August 2026

Vageesha Wellalage
Planner
Department of Planning, Housing and Infrastructure

Dear Vageesha

Re: Canterbury-Bankstown City Council Submission to the State Significant Development Modification Application, MP05_0147-Mod-16 – (Enfield Intermodal – Alternative Operational Traffic Volumes)

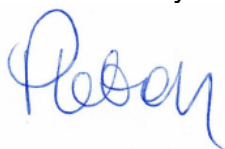
Thank you for the opportunity to provide a submission in response to the exhibition of the State Significant Development (SSD) Modification Application (MP05_0147-Mod-16) for the Enfield Intermodal Logistics Centre (ILC) in Strathfield South. Council has reviewed the documentation made available on the Department of Planning, Housing and Infrastructure (the Department) Planning Portal website and enclosed with this letter is Council's response.

Based on our review of the application, Council generally supports the proposed modification to provide greater flexibility for the operation of the ILC given its important role in supporting Sydney's broader freight network and economy.

Although we are supportive of the proposed modification in principle, Council raises concern that the increase in the maximum traffic movements by 40% which has the potential for amenity impacts on the surrounding area, such as noise and air quality impacts that must be properly assessed through updated monitoring and analysis rather than relying on historical reports prepared for previous applications. Council's detailed comments are provided in Attachment A and Council's recommended conditions of development consent are in Attachment B.

If you require any clarification or have any enquiries regarding this submission, please feel free to contact me on 02 9707 5593 or Patrick.Lebon@cbc.city.nsw.gov.au.

Yours sincerely



Patrick Lebon
**Coordinator Strategic Assessments
Canterbury Bankstown Council**

Attachments:

- A – Council's detailed Comments
- B – Council's recommended conditions of development consent



Attachment A – Summary of Additional Information, Amendments and Recommended Conditions of Consent Requested by Council

Theme	Key considerations and recommendations
Traffic, transport and parking	• The applicant must prepare a revised Traffic Impact Assessment that addresses the potential amenity impacts from the increase in actual truck movements. • The Overarching Operational Traffic Management Plan (OTMP) must be amended to ensure light commercial vehicles follow same access routes as heavy vehicles unless making local deliveries
Noise and air quality impacts	• The applicant is to undertake background noise and air monitoring and update the Noise Impact Assessment (NIA) and Air Quality Assessment (AQA) to reflect the current environmental conditions near the site. • Various recommended conditions of consent to apply to the proposed modified operation of the site, subject to DPHI's approval. Refer to Attachment C.
Other matters	• Council request that an updated consolidated Development Consent is published on the Planning Portal for ease of reference by site owner/operator, Council and the community.



Attachment B – Detailed Comments

Traffic, transport and parking

- The report states that the additional 4,500 Passenger Car Unit (PCU) could equate to approximately 2,250 truck movements per day, comprising around 1,125 inbound and 1,125 outbound truck movements.
- While the use of PCUs is appropriate for road capacity modelling and SIDRA analysis, the assessment should also consider the implications of the corresponding increase in actual truck movements from an amenity perspective.
- Matters such as noise, vibration, air quality, visual amenity, pedestrian safety and community perception are influenced by the number and type of heavy vehicles rather than PCU values alone.
- The assessment concludes that a new operational daily traffic baseline of 10,580 PCU can be accommodated by the surrounding road network.
- Given that the identified access routes are on State roads and the traffic modelling indicates acceptable network performance, Council raises no objection to the proposal from a local road network capacity perspective.

Recommendations

- Given the potential impacts on adjacent State Classified Roads and broader Sydney Metropolitan road network, the application must be referred to Transport for NSW (TfNSW) by DPHI for review and comment.
- The applicant must include an assessment of the potential implications of the increase in actual truck movements from an amenity perspective.
- The Overarching Operational Traffic Management Plan (OTMP) must include the requirement for light commercial vehicles (including vans and the like) to follow the same access routes as heavy vehicles unless making local deliveries.

Noise and air quality impacts

- The Noise Impact Assessment (NIA) and Air Quality Assessment (AQA) appear to rely mostly on historical monitoring data, assumptions and analysis without carrying out updated modelling that specifically responds to the increased daily traffic baseline.
- The NIA and AQA also do not propose any changes to the conditions of consent to mitigate impacts from the significant baseline increase in PCUs.
- Further assessment is required to demonstrate that potential environmental impacts have been appropriately identified, assessed and mitigated using current noise and air quality monitoring data.



Recommendations

- Updated noise modelling be undertaken using current traffic assumptions and background noise measurements.
- Condition 3.3 of the existing consent be amended to require a targeted noise audit within three to six months of implementing the increased daily traffic baseline, regardless of whether the existing throughput thresholds have been reached, to verify the actual operational noise impacts and enable any necessary mitigation measures to be implemented promptly.

Other matters

Given the number of modifications to the original development consent MP 05_0147, should this modification application be approved, Council requests that DPHI issues a consolidated development consent on the Planning Portal. This will greatly assist all key stakeholders, including Council and neighbouring properties to understand the conditions that the modified use of the site must operate within.

Recommendations

- An updated consolidated Development Consent is published by DPHI on the Planning Portal in the event this modification application is approved.



Attachment C

Recommended conditions of development consent

Conditions to apply during operation

Acoustic Report

The acoustic report prepared by Arup Australia Pty Ltd, titled Enfield Intermodal Logistics Centre (ILC) – Modification 16 Noise Impact Assessment, reference number AC01, dated 12 June 2026 and all the Conclusion stated within Section 6 of the report, form part of the development consent.

The principal certifier shall obtain a report from an appropriately qualified acoustic consultant, not previously involved with the development, stating that the recommendations outlined in the above-mentioned acoustic report have been implemented and that the relevant noise criteria have been satisfied prior to the issue of any occupation certificate. A copy of the report is to be submitted to Council prior to the issue of an occupation certificate.

Condition reason: To ensure the development is built and remains consistent with approved plans and documentation.

Acoustic Assessment

If a noise issue arises, the owner and/or occupier must, upon request by Council, engage a suitably qualified acoustic consultant to undertake a noise assessment of the development and prepare an acoustic report detailing recommendations to address the issue. The report and any necessary noise attenuation works must be submitted to Council for approval, and the required works must then be implemented. Both the acoustic report and the completion of any required works must occur within 30 days of Council's request, or within an alternative timeframe agreed to by Council.

Note: Suitably qualified acoustic consultant means a consultant who possesses the qualifications to render them eligible for membership of the Australian Acoustical Society, Institution of Engineers Australia or the Association of Australian Acoustical Consultants at the grade of member.

Condition reason: To protect the amenity of the surrounding area.

Vibration

The use of the premises and the operation of plant and equipment must not give rise to the transmission of a vibration nuisance or damage to other premises as defined in the 'Assessing Vibration: A Technical Guideline' (NSW Department of Environment and Conservation, 2006).



Condition reason: To protect the amenity of the surrounding area.

Complaint Handling Procedure

The Intermodal Logistic Centre(ILC) management must implement and maintain a complaint handling procedure. Every complaint must be recorded on a Complaint Form and kept in a Complaints Register. The Complaint Form must contain the following information:

1. Name, address and contact details of the complainant,
2. Time and date the complaint was received,
3. The nature of the complaint or incident (see below what constitutes an incident),
4. The time and date the incident occurred,
5. The name of the employee that received the complaint,
6. Actions taken to investigate the complaint and the summary of the results of the investigation,
7. Indication of what was occurring at the time the incident was observed,
8. Required remedial action,
9. Validation of the remedial action, and
10. Summary of feedback to the complainant and name of employee who gave the feedback.

Incident includes:

- i. Any breach of a plan of management (where applicable),
- ii. Any complaint by any person about the operation of the premises,
- iii. Any complaint by any person about noise emanating from the premises, or
- iv. Any event that may cause concern to any person as a result of the conduct and/or an act of any person(s) on, entering or exiting the premises.

All complaints shall have an initial investigation commence within seven (7) days from the date of receipt of complaint.

The Complaints Register must always be held on the premises and shall be reviewed monthly by ILC management to ensure complaints are investigated and resolved in a timely manner.

The Complainant must be notified of the results and actions arising from the investigation.

The Complaints Register must contain a direction that all complaints of a criminal nature are to be reported to the Police immediately.

A copy of the Complaints Register shall be provided to Council or Police immediately upon request.

Air Quality Report

The air quality assessment prepared by Arup Australia Pty Ltd, titled Enfield Intermodal Logistics Centre (ILC) Modification 16 Application Air Quality Assessment, reference: Enfield ILC_Modification16_AQA_RevA, dated 12 June 2026 and Section 6: Mitigation and



management measures & Section 7: Summary and conclusions stated within the report, form part of the development consent.

Condition reason: To ensure compliance with the relevant New South Wales legislation.

POEO – General

Any activity carried out in accordance with this approval must not give rise to offensive odour, offensive noise or pollution of air, land or water as defined in the Protection of the Environment Operations Act 1997 and Regulations.

Condition reason: To ensure compliance with the relevant New South Wales legislation.

General Amenity

The operation of the development must not adversely affect the amenity of the neighbourhood or interfere unreasonably with the comfort or repose of a person who is outside the premises by reason of the emission or discharge of noise, fumes, vapour, odour, steam, soot, ash, dust, wastewater, waste products, grit, oil or other harmful products.

Condition reason: To protect the amenity of the surrounding area.

Traffic Management Plan

Within 28 days of the approval of MP05_0147-Mod-16, a copy of the revised Overarching Operational Traffic Management Plan (OTMP) for the site must be provided to Canterbury-Bankstown Council for their records. A copy of the OTMP is to be emailed to Council@cbc.city.nsw.gov.au.