



DOC16/629208-03  
SSD 16\_7628

Ms Alix Carpenter  
Infrastructure Assessments  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Ms Carpenter

Dear Ms Carpenter

**Notice of Exhibition - Moorebank Precinct East Intermodal Terminal - Stage 2 (SSD 16\_7628)**

I refer to your letter dated 12 December 2016 to the NSW Environment Protection Authority (EPA) to review the Environmental Impact Statement (EIS) for the above development proposal.

Sydney Intermodal Terminal Alliance (SIMTA) is seeking approval under Part 4 of the EP&A Act, for the construction and operation of Stage 2 of the Moorebank Precinct East (MPE) project, formerly referred to as SIMTA. Key components of the proposal include:

- Warehousing comprising approximately 300,000 m<sup>2</sup>, additional ancillary offices and the ancillary freight village;
- Establishment of an internal road network and connection of the proposal to the surrounding public road network;
- Ancillary supporting infrastructure, including:
  - Stormwater, drainage and flooding infrastructure;
  - Utilities relocation and installation
  - Vegetation clearing, remediation, earthworks, signage and landscaping
- Subdivision of the MPE Stage 2 site.

Please note that Liverpool City Council is the Appropriate Regulatory Authority for this project under the *Protection of the Environment Operations Act 1997*. 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 EPA has reviewed the EIS for the proposed development of Moorebank Precinct East - Stage 2 (SSD 16\_7628) dated December 2016, in relation to these key environmental issues. The EPA's comments and recommendations are attached to this letter (Attachment A).

The EPA has also assessed the contamination status addressed in the EIS. It is noted that the work will be completed in accordance with all relevant management and action plans as endorsed by the Project EPA Accredited Site Auditor to minimise the risk of environmental harm and to human health. The EPA recommends the EPA accredited Site Auditor to approve any remediation works and other activities during the proposed construction works, which may pose environmental or human health risks. It is also recommended that an EPA accredited Site Auditor be used to assess the suitability of the land for the intended use.

If you wish to discuss any of the concerns raised in this letter, please contact Rashad Danoun on 9995 6370.

Yours sincerely

 27-2-2017

**BENN TREHARNE**

**A/Unit Head Metropolitan Infrastructure**  
**NSW Environment Protection Authority**

Encl. Attachment A – EPA comments and recommendations regarding the EIS for the proposed development of Moorebank Precinct East - Stage 2 (SSD 16\_7628) dated December 2016, in relation to the key environmental issues of noise and vibration, and air quality.

## **Attachment A**

**NSW Environment Protection Authority (EPA) comments and recommendations regarding the Environmental Impact Assessment (EIS) for the proposed development of Moorebank Precinct East - Stage 2 (SSD 16\_7628), dated December 2016, in relation to the key environmental issues of noise and vibration, and air quality.**

The EPA has identified the following site specific concerns in assessing the Environmental Impact Assessment for the proposed development of Moorebank Precinct East - Stage 2.

### **NOISE AND VIBRATION ASSESSMENT**

#### **Construction working hours**

The assessment proposed, without justification, out of hours works including material delivery, direct placement or stockpiling, crushing and the Moorebank Avenue upgrade:

- between 6am and 7am on weekdays
- between 6pm and 10pm on weekdays
- between 7am and 8am Saturdays
- between 1pm and 6pm Saturdays.

The *Interim Construction Noise Guideline* suggests that out of hours work should only occur with strong justification. The concept approval for the site also requires "Where work hours outside of standard construction hours are proposed, clear justification and detailed assessment of these work hours must be provided, including alternatives considered, mitigation measures proposed and details of construction practices, work methods, compound design, etc".

Any proposed out of hours works should only be allowed if further justification is provided, to the Department of Planning and Environment's (DPE) satisfaction and for reasons other than convenience, for example if it is unsafe to do certain work during standard hours.

#### **Recommendation**

**Before approving the project, DPE should require the proponent to justify, to DPE's satisfaction, why out of hours construction works are necessary (for reasons other than convenience).**

#### **Crushing and concrete batch plant**

The project includes using a crushing plant and one or more concrete batch plant. These appear to be proposed so that concrete products can be produced on site rather than bought from another supplier. Based on the assessment, the crushing plant will run for about a year and the batch plant will run for about 21 months.

Use of construction noise criteria for temporary batch plants when concrete is locally available may lead to undesirable outcomes where louder temporary plants are preferred over established operational plants. Before approving this proposal, DPE should require the proponent to explain, to DPE's satisfaction, why onsite crushing and concrete batch plant are desirable in this case. For example:

- Are there materials which should be recycled onsite, to avoid unnecessary transport impacts?
- Are suitable products not available, so they need to be produced on site?

Any potential benefits of on-site recycling and reductions to transport volumes need to be balanced against increased impacts caused by on-site processing during the construction phase, including noise.

#### **Recommendation**

**Before approving the project, DPE should require the proponent to justify, to DPE's satisfaction, why onsite crushing and concrete batch plant are desirable in this case**

### **Construction noise and vibration management plan**

The assessment predicted that construction noise from the project, in combination with stage 1 and Moorebank Precinct West, would exceed standard hours noise management levels by about 2 A-weighted decibels (dBA) in Casula. The assessment stated that a construction noise and vibration management plan would be developed, and that commitment should be adopted in any approval for the project.

### **Recommendation**

**Any approval for the project should require a construction noise and vibration management plan**

### **Detailed design**

The assessment stated that using horns and tonal reversing alarms would be strongly discouraged, and the restrictions detailed in the Operational Noise Management Plan. Because road trucks will access the site, tonal alarms will be used at times by road trucks on the site. Truck reversing alarms were predicted to meet the sleep disturbance screening criterion at all receivers, but detailed design should still minimise the need for reversing at the site.

The assessment stated that pneumatic trailer brakes on trucks would exceed the sleep disturbance screening criterion by 1 dBA in Wattle Grove, which "is considered negligible". The EPA suggests that this exceedance can be adequately mitigated during detailed design of the project, for example by encouraging trucks to stop only in shielded areas. Truck trailer brake valves are located close to the ground, and should not be difficult to shield effectively.

### **Recommendation**

**Detailed design of the project should minimise the need for reversing on the site and for trucks to stop in exposed areas**

### **Operational noise**

Other reports on the Moorebank Precinct have acknowledged that sensitive receivers would see both Moorebank projects as the one facility. The assessment compared their combined contribution to the amenity criteria at sensitive receiver locations. If the projects are likely to be viewed as one facility, the proponent should also predict the maximum intrusive contribution of the two projects in combination.

### **Recommendation**

**The proponent should predict the maximum Leq(15min) operational noise contribution expected from the combination of the project and Moorebank Precinct West**