



14 July 2011

Director of Infrastructure Projects
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam,

Exhibition of Modification Request for Intermodal Logistics Centre at Enfield- Modification 5 (MP 05_0147 MOD 5)

Thank you for providing Bankstown City Council the opportunity to comment on the proposed modification request for Intermodal Logistics Centre at Enfield.

In considering the modification request, Council raises the following issues and concerns that the Department must address prior to determining the proposal:

A) Justification for the variation to the new estimate of excess spoil

The modification request shows a significant variation to the previously estimated amount of excess spoil considered unsuitable for engineering fill. It is noted that the previous estimate of the spoil was 37,000 cubic metres which was proposed to be removed from the site and disposed off site to a landfill facility. The new estimate shows that the volume of unsuitable material which must be disposed off may be up to 60,000 cubic metres.

The proposal however does not provide much information to justify how the project allowed such variation to occur which is nearly twice the previous estimate.

The modification request is a significant departure from the previously approved plan in terms of how it would permanently affect the future landscape of the locality. Although the proposal would eliminate the need for additional heavy vehicle traffic from the site to dispose off the excess spoil, it does raise a serious concern on the visual amenity of the surrounding area due to the volume and scale of the mound proposed.

It is recommended that the Department seek further clarification on the variation to the estimate of the excess spoil prior to determining the proposal.

B) Visual amenity concerning the proposed mound at Mt Enfield

The excess spoil is proposed to be relocated at the southern part of the site on and around Mt Enfield, increasing the height of the hill by 6.7 metres at its highest point.

As indicated in the proposal, the level of the footpath on the northern side of Punchbowl Road is approximately 26m AHD, whereas the highest point of Mt Enfield will be raised from 29.3 m AHD to 36.0m AHD. This means the reshaped Mt Enfield will be visible from a number of residential areas around the locality with most severe impacts to those on the southern part of Mt Enfield, along Punchbowl Road overpass facing north-west and residences fronting Punchbowl Road in the vicinity of the rail corridor with an approximate viewing distance of 20 to 300 metres.

It is recommended that Council and community be consulted for the preparation of a detail Landscape Plan and the Landscape Management Plan.

C) Construction and Operational Environmental Management Plans and Sub Plans

Council considers that neither the Environmental Assessment nor the Preferred Project Report satisfactorily resolved Council's previous concerns relating to traffic, noise, air quality and hazard assessment of the project.

Council notes that the cumulative noise and dust emissions from both the approved activities and the additional filling activities at Mt Enfield will have an adverse environmental impact on the surrounding residential properties if appropriate monitoring systems and remedial mechanisms are not in place.

It is recommended that Council be notified and consulted with for the preparation of Construction and Operational Environmental Management Plans and Sub Plans including Construction Traffic Management Plan, Environmental Noise Management Plan, Dust Management Plan etc in order to ensure that our concerns are addressed appropriately.

If you have any questions relating to this submission, I can be contacted on 9707 9606.

Yours faithfully,



James Carey
Manager, Sustainable Development