



**STRATHFIELD COUNCIL SUBMISSION
July 2011**

**Exhibition of Modification Request for Intermodal Logistics Centre at Enfield
(Modification 5 (MP 05_0417 MOD 5))**

INTRODUCTION

This submission has been prepared by Strathfield Council in response to the public exhibition of the modification request for the Intermodal Logistics Centre at Enfield.

Council is unable to support the proposed modification request until certain issues are further addressed. These include an ecological assessment to ensure that the impacts of the proposal on the Green and Golden Bellfrog population have been fully considered and sufficient mitigative measures adopted to minimise the impacts of the proposal on adjoining residential areas such as dust and impact on views. These concerns are outlined in the submission as follows.

Dust

Concerns are raised regarding the dust impacts from the fill material during both excavation, its transportation by truck and stabilizing the mound. These activities particularly during periods of high winds may potentially impact on adjoining residential areas. The Environmental Construction Management Plan for the original proposal should be amended in relation to the proposed new works to better address this issue and a copy provided to Council.

The modification request indicates that a watercart will be used to spray water onto the internal haul route and material deposition area (ie Mt Enfield) to control potential dust due to the large scale and extent of the works (eg transportation of 120,00 tonnes, approx. 8000 short truck movements over an 18 month period). However more intensive mitigative measures need to be established with this modification to ensure impacts of dust are minimized eg. sprinklers could be activated automatically using recycled water during periods of high or alternatively exposed areas could use protective covering to prevent dust.

There are also potential dust impacts on the Green and Golden Bellfrog populations (refer comments Protection of Frog Habitat Corridor).

Height of Mound

The modification report confirms that the raising of the earth mound at its highest point from 29.3m AHD to approx 36.0m AHD will be visible from a number of residential areas. This may potentially impact on views from adjoining residential areas or may actually screen less attractive views. Further consultation should be undertaken to determine the feedback of local residents and to address their concerns. Additionally the aesthetic impact of the enlarged mound will be dependent on the success of the re-vegetation. (Refer to comments Proposed Landscaping/Re-vegetation).

The information in the modification report relating to height also appears to be misleading and requires further clarification. Contrary to section 2.1 which identifies a rise of approx 6.7m at its highest point, according to the long section provided in figure 1.3, the highest point of the proposed ground level appears to be 35.2 with an existing ground level of 21.1 which results in a 14.1m high difference. This is significantly greater than the 6.7m rise identified.

The proposal furthermore should include shadow diagrams to illustrate the full potential impacts of increasing the mounds height. These should demonstrate the 9am, 12pm and 3pm shadowing effects of both the existing and proposed mounds. These plans should be provided before the modification proposal is considered.

Protection of Frog Habitat Corridor

There is a need to ensure sufficient measures are implemented to protect the existing frog habitat and movement of frogs which are located in close proximity to proposed works in accordance with 'the Frog Protection Plan'. This includes sediment and erosion controls & fencing.

The report indicates that the Mt Enfield mound does not contain significant plant or animal species, the filling over the mound is not anticipated to have significant negative impacts on flora and fauna and in the long term. The re-vegetation of Mt Enfield with suitable native species will have a positive impact on the ecology of the area. Council has concerns however that the re-vegetation of Mt Enfield may attract species which are potential predators for the Green and Golden Bellfrogs. A further ecological assessment should be undertaken to ensure that the impacts of the proposal on frog population are fully considered.

The proposed development should be subject to an ecological assessment in accordance with Section 5A of the EP&A Act 1979. Council's experience in the past in relation to the Green and Golden Bellfrog habitat is that it is paramount to ensure that shrubs and only a few low trees adjoin the Green and Golden Bellfrog habitat in order to prevent the establishment of vegetation that provides roosting sites for predatory birds.

The ecological assessment should consider the importation of soil, compost and other landscaping materials for the implementation of the re-vegetation of 'Mt Enfield' as these materials may contain spores of *Batrachochytrium* which is potentially fatal to the Green and Golden Bellfrog. Such materials should be certified to have been heat treated in accordance with industry standards to kill chytrid.

Concern is also raised in relation to leachate and dust protection measures that will be incorporated in order to ensure these do not adversely affect the nearby Green and Golden Bellfrog habitat.

The assessment also notes that sediments could enter Coxs Creek and can cause a decline in water quality and potential damage to aquatic ecosystems. Given that Coxs Creek is potentially a species movement corridor for the endangered Green and Golden Bellfrog to adjoining habitat areas such as the Juno frog ponds and Coxs Creek reserve, and there is a potential impact on this threatened species as a result of the proposed mound modifications, a new species impact statement, should be provided to demonstrate the potential damage to this endangered species.

The species impact statement should also address what the loss of existing vegetation / potential habitat on the existing mound will have on the species particularly as other frog habitat areas directly north of the mound were recently cleared of all existing vegetation to allow for the creation of frog ponds.

In addition runoff from the mound could flow into the new frog ponds as could sediment in dust form blow into the adjoining frog ponds resulting in excessive sediment in the new ponds which would be detrimental on the water quality and habitat the new ponds provide.

In relation to section 3.1.4 although the existing mound is primarily colonised by weeds, it may be providing habitat for the Green and Golden Bellfrog particularly as vegetated habitat areas where the frog ponds have recently been constructed were wiped out and frogs may have accessed the vegetation within or near the mound as a result.

Concerns are also raised in relation to the potential loss of existing habitat that the vegetation on the mound currently provides for small birds, reptile and amphibian species. Consideration of where such fauna can move to during the proposed construction period should also be included in the modification application report.

Drainage

The plans and information do not clearly demonstrate where the runoff from the proposed mound would be directed to. Ponding and flow path areas for runoff should be provided to demonstrate that the additional runoff volume and velocity has been investigated and allowed for.

The drainage from the site needs to be controlled so that there is no additional stormwater leaving the site at each point of discharge than occurred prior to the proposed development.

Noise

The proposed modification poses a number of potential noise impacts on adjoining residential areas from the movement of trucks and operation of machinery and equipment involved with the excavation and potentially with the mounding.

The modification report indicates that the additional noise contribution from the proposed modification is negligible at all surrounding residences. There is a need to ensure that the mitigation measures outlined in section 3.1.1 of the modification report are adhered to. This includes the need for regular and ongoing consultation with the community.

Contamination

The Environmental Construction Management Plan submitted with the original proposal should be updated and revised to include the recent modification including how to address any contaminants exposed during the excavation process.

Proposed Landscaping/Re-vegetation

It is suggested that the landscaping works to stabilize the mound be undertaken using all indigenous plant species from local genetic sources. Considerable care needs to be taken with the selection and sourcing of species for the proposed fill mound. In terms of planting due to the volume of plants required they need to be ordered well in advance of the actual planting occurring. If a suitable quality of seed is available hydromulching could be a useful means of re-vegetating perhaps in conjunction with plantings which would capture site runoff. The proposed species mix identified in the Landscaping Planting Plan) and density of planting appear to be satisfactory. It is suggested that the 'River She Oak Monoculture' relies on a species of Hilloak (*C. littoralis*). If the monoculture is dependent on this species then it will need to be located upslope away from the poorly drained areas.

It also appears that the slopes of the proposed mound are too steep for planting. The cross section at chainage 23 identified in figure 1.4 for instance identifies a very steep banked proposed mound. With an estimated 42.5m vertical : 34.5m horizontal = grade of approx 1:2.5. recommended planting grade is 1:10. the slopes are too steep to accommodate for suitable grading for planting, this can pose significant scouring and sediment loss particularly in rainfall events where the steepness of the slopes will cause excessive scouring.

Sediment can potentially run off into the adjoining Coxs Creek and Green and Golden Bellfrog habitat area (refer to Protection of Frog Habitat Corridor). Section 3.1.3 of the modification application report also indicates that the soils have a highly variable erodibility level. The proposed mound with its very steep slopes should not therefore be permitted.

Traffic Reduction

The reduction of local area traffic impacts for the removal for retaining the excavated material on site would only be a temporary reduction and should not be used to justify the permanent placing of excavated fill material on site.

Incorrect Labelling of Diagrams

Figure 1.1 is inaccurate and a large area of land identified as 'recreational' on the southern side of Cooks River opposite Dean Reserve is actually industrial and will be developed in the near future.

Figure 1.2 identifies a cross section at chainage '32' however the cross section provided in figure 1.4 is identified as chainage 23. This should be clarified as to the exact location of the section.

The fill reuse area long section shown in Figure 1.3 is misleading given that the level identified as 'punchbowl rd footpath level' is actually approximately the highest point on the existing vehicular bridge crossing over the railway yards. This bridge is quite evident in the existing landscape and to note that the proposed mound will be more than 10m higher than the existing bridge level, the proposed mound will be visually intrusive on the

landscape. The existing mound is already quite large and intrusive. It should be clearly identified that the footpath is actually on the existing vehicular bridge.

Future Use Of Subject Area.

One of the proposed outcomes of the modification will be to establish level access from the south eastern corner of the Enfield site to Punchbowl Road, as currently Punchbowl Road is higher than the adjoining subject site. Whilst creating level access is not necessary a negative impact of the proposal, it may have implications on the future use of this land.

The original 5/9/2007 Enfield ILC project Approval by the Minister of Planning was based on the south eastern portion of the Sydney Ports site being established as "Ecological Heritage Community Area with controlled access" which included the Tarpaulin Shed and Frog Ponds. This area is the land bordered by Punchbowl Road, Cosgrove Road, the Rail Corp Existing Marshalling Yards land and extending hard stand areas associated with 'Warehouse A' to the north.

Council has concerns for the future use of the "Ecological Heritage Community Area" that was committed for community and ecological purposes as part of the original approval. For instance in creating level access to Punchbowl Road, this potentially may encourage Sydney Ports in the future to pursue approvals to use this area for commercial uses such as a service station or other commercial industrial opportunities.

Conclusion

Council is unable to support the proposed modification request until the issues identified in this submission have been fully addressed.

