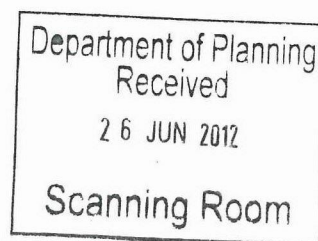


22 June 2012



Frankie Liang

Mr Glenn Snow
A/Director
Infrastructure Projects
NSW Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001



Dear Mr Snow

RE: ENFIELD INTERMODAL LOGISTICS CENTRE MODIFICATION REQUEST NO.6

Strathfield Council welcomes the invitation to provide comments regarding the public exhibition of Modification Request No.6 (MP 05_0147 MOD6) for the Intermodal Logistics Centre at Enfield.

Council has undertaken a review of the modification request and has identified a number of major areas of concern. These are documented in detail in the attached Council submission which in summary include but are not limited to:

Revised Site Layout Plan

- The 'Ecological and Community Area' should be indicated on the plan and represent all the land to the southern side of Cocks Creek consistent with the original approval.
- The amount of general landscape areas along the eastern side of the site has been reduced from that in the original approval which is detrimental to the landscape aesthetics and biodiversity opportunities.
- 'The fenced access track to the marshalling yards for rail maintenance 4m wide' (to north of Tarpaulin Factory) enters Cosgrove Road opposite residential properties and should be relocated to reduce impacts.

Draft Subdivision Plan

- The subdivision pattern conflicts with the original approval for the southern section of the site becoming a 'Community, Heritage and Ecological Area'.
- The subdivision pattern conflicts with the originally approved amount of general landscape areas particularly to the eastern side of the site.

Inclusion of Former Toll Lease Area

- The full impacts from the proposed inclusion of the former Toll site such as contamination, potential pavement reconstruction, drainage and traffic need to be considered in greater detail.

Drainage Changes

The proposed site design and drainage scheme does not adequately address:

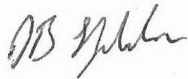
- the issue of surface runoff from upstream properties including adequate surface flow paths to convey all flows to a 1:100 year standard.
- raising surface ground levels above predevelopment levels will adversely impact overland flow and potential flooding of adjoining properties.
- the proposed method of storm water runoff management does not meet Council's standards.

Noise Wall

- The proposed modification to the condition concerning the on-site monitoring station is not acceptable as this station needs to constantly remain operational to assist monitoring issues such as dust, rather than rely on related data from other monitoring sites.
- Utilising containers as acoustic barriers is not an acceptable approach for a number of reasons as detailed in the submission.

Should you have any question in regards to this letter, please contact me on 9748 9975.

Yours sincerely



DAVID HAZELDINE
A/DIRECTOR TECHNICAL SERVICES



STRATHFIELD COUNCIL SUBMISSION

Enfield Intermodal Logistics Centre, Modification Request (MP 05_0147 MOD 6)

This submission has been prepared by Strathfield Council in response to the public exhibition of Modification Request (MP 05_0147 MOD 6) for the Enfield Intermodal Logistics Centre.

Council has significant concerns in regard to several aspects of the Modification Request as outlined below.

Site Layout Changes

1. The Revised Site Layout (refer Attachment 5) for Modification Request No 6 does not indicate or label the 'Community and Ecological Area'. Council requests that the Site Layout Plan be amended to be consistent with the original 5/9/07 project approval for Enfield ILC ie. the precinct south of Coxs Creek including Mt Enfield, Tarpaulin Factory, Frog Ponds should all be labelled 'Community and Ecological Area' and coloured accordingly eg. light green.

The original approval is illustrated in Concept Layout (refer Attachment 1), from the Environmental Assessment which forms part of 'terms of approval' in the Project Approval. This clearly labels the 'Community and Ecological Area' and clearly indicates this area with green hatching to include all the land to the south of Coxs Creek including the Tarpaulin Factory and Mt Enfield area.

The 'Community and Ecological Area' is also clearly labelled and indicated in green colour on the 'Layout and Key Features' Plan (refer Attachment 3) which was prepared by Sydney Ports some time prior to the Modification No 1 approval. Whilst the January 2010 'Concept Layout Plan' (refer attachment 4) which was prepared subsequent to Modification No 1 & 2 also clearly labels and indicates in green colour the 'Ecological Heritage Community area with controlled access'.

It should also be noted that the Strathfield Draft LEP 2011 which was publicly exhibited from 31 January to 23 March 2012 includes the whole of the originally approved 'Ecological & Community and Heritage Area' as RE1 Public Recreation to suit and support this area, with main section of the Enfield ILC site zoned to General Industrial IN1.

2. Since the original approved Site Layout Plan, the amount of landscaped areas (not including 'Community and Ecological Area') along Cosgrove Road has gradually been reduced to the detriment of the sites landscape aesthetics, biodiversity opportunities and screening of the site from surrounding areas. This is particularly impacts the Cosgrove Road frontage of the site.

For instance Attachment 2 and Attachment 3 clearly indicate the amount of landscape area across the site (not including the 'Community and Ecological Area') in accordance with the Project Approval. However the gradual reduction in general landscape area is evident in Attachment 4 which appears to be as a result of Modification request No 1 & 2.

The general landscape area (not including the 'Community and Ecological Area') indicated in the Modification Request No 6 'Revised layout Plan' (refer attachment 5) clearly has been significantly reduced from the original approval and from previous modification requests. Council

requests that the further reductions in landscape area proposed in this modification request be refused and that opportunities to return the more consistent with the originally approved landscape areas be pursued.

3. ARTC Access Point - The fenced access track to the marshalling yards for rail maintenance 4m wide' (to north of Tarpaulin Factory) enters Cosgrove Road opposite residential properties. The truck movements generated by the planned ARTC rail line project will have detrimental impacts on the residential properties on the eastern side of Cosgrove Road. This impact would be reduced if the entry was located further north along Cosgrove Road. It is noted that Council did provide comment and issues for consideration (February 2010) in regard to the general concept of providing an access route for the ARTC, however this specific access point was not provided to Council to comment on.

Subdivision of ILC Precincts

1. The proposed subdivision pattern (refer Attachment 6) conflicts with the intent of the original approval for the southern section of the site becoming a 'Community, Heritage and Ecological Area'. The subdivision plan proposes to subdivide the 'Ecological & Community and Heritage Area' into three lots being: Lots 19, 20 and 25. There is no advantage or logical justification provided in the modification request to divide up the 'Ecological & Community and Heritage Area' which is a key component of the original Project Approval. Subdividing Lot 19, 20 and 25 undermines the preservation of this area especially as it creates potential opportunity for the sale or leasing, particularly of Lot 19 which includes the area at the corner of Punchbowl Road and the Tarpaulin Factory.

The subdivision that creates Lots 19, 20 and 25 is a considerable change that is not supported by Council because it potentially diminishes the amount of land originally dedicated in the original approval for community, ecological and heritage purposes. This precinct should be protected by retaining the land to the southern side of Cocks Creek as one lot. Operational issues for this area such as controlled access to the frog habitat and to the steeper areas of Mt Enfield and whether the Tarpaulin Factory remains on site or is relocated, do not impact on preserving this whole area as a 'Ecological & Community and Heritage Area'.

As discussed under the Site Layout Changes section, Councils Draft LEP 2011 as publicly exhibited includes the whole of the originally approved 'Ecological & Community and Heritage Area' as RE1 Public Recreation to support this area.

2. The gradual reduction in the general landscape area across the Enfield ILC, particularly along the eastern side of the site facing Cosgrove Road as outlined above under the Site Layout Changes section is a serious concern. The subdivision of the sites to the eastern section of the site limits the areas dedicated to general landscaping to Lot 21 (other than the Community & Ecological Area south of Cocks Creek) which is not an acceptable amount. Therefore Council does not support the subdivision layout in the present form unless more areas are dedicated to general landscape area to be more consistent with the original approval.

Inclusion of Former Toll Lease Area into the ELC

The full impacts from the proposed inclusion of the former Toll site such as contamination, whether pavement reconstruction is necessary and the drainage implications need to be considered in greater detail than outlined in the modification report. For instance the application indicates that if new pavement is necessary this would potentially generate around 1,300 additional truck movements over several weeks, however the potential traffic impact has not been considered in the report.

Noise Wall Adjustments

In relation to modification request No 6, acoustic report the following comments are made.

The AECOM detailed design acoustic assessment report of 30 September 2009 is based on computer modelling of base line assessments provided by another party at the environmental assessment stage. As a result Council is not in a position to question either the assessments provided or the modelling methodology but to simply comment on the conclusions

Council raises concern on the following issues

1. The reports conclusions Cl. 6 page 38 state "Modelling shows that the recommended mitigation measures allow the established intrusive and amenity noise criteria to be satisfied in the majority of assessment periods and at the majority of locations"

If criteria have been set they should be complied with all the time at all locations. What is the purpose of having criteria if they can nearly be met?

These criteria have been set to enable residents to maintain living amenity in their own dwelling all the time not for most of the time.

The size, scale, hours of operation and noise generating capacity of this development demands that adjacent residents are protected.

2. Councils power to address any noise complaints arising from the operation of the facility will be limited to referring the complaint to the Minister. This is another reason why the facility should comply as the adverse weather conditions or other factors which lead to breaches may be protracted.

3. The use of empty containers as sound barriers to replace the existing planned acoustic walls is opposed as these barriers are formed from temporary components of the facility. In periods of short supply or other reasons they may be used for their original purpose reducing the effectiveness of the barrier. Also as they are easily moved they may over time as a result of being taken and replaced result in the location of the barrier creeping out of position.

4. Using containers as sound walls is also unsightly particularly as they are painted with a variety of colours and signage and in addition they deteriorate over time and become even more unsightly. For these reasons Council is of the opinion that these barriers should be constructed of a permanent, durable and equally effective material that is more aesthetically pleasing.

5. Once established this facility whilst currently having a maximum design throughput has the potential for expansion beyond current foreseeable limits due to its strategic location, and the cost of duplication or relocation. For this reason all noise criteria should be met at all times

6. Whilst there is to be noise monitoring assessment at various annual throughput stages there also needs to be a commitment to immediately address and rectify issues not only at these stages but also address issues of concern to Council and residents as they arise.

7. The noise assessment report whilst assessing noise from a number of sources makes no mention of noise generated from shunting carriages. Depending on the length of the train and the state of the containers (empty or full) this can generate a sound that runs the length of the train (as successive carriages collide) over a longer period than a dropped container. Given the potential noise levels and impact on the surrounding residential precincts particularly at night, this should be assessed.

Meteorological Station

The proposed modification to the condition concerning the on-site monitoring station is not acceptable as constant operation of this station to needs remain a high priority. For instance the station is essential to providing related meteorological data that assists in the monitoring and addressing of dust issues, rather than rely on related data from other monitoring sites in the region such as Sydney Olympic Park or Bankstown. If an amount of offline time was to be established for emergency repairs to the station through a modified condition, then this amount of time would need to be restricted to a very short period.

Drainage Changes

An assessment of the modification proposal indicates that concerns raised regarding stormwater drainage issues in Council's submission in February 2006 still remain unresolved. Your attention is particularly drawn to the following issues:

1. The subject site is located in the upper Cooks River Catchment. Four major drainage culverts cross the site. Each of the four drains conveys stormwater runoff from upstream catchments through the site to discharge into tributaries of the Cooks River. Council's 600mm reinforced concrete pipe that drains the northern upper section of Roberts Road sub-catchment area is not included. The proposed project seeks to reshape the site in order to provide a suitable operational area for the Intermodal Logistic Centre. This reshaping has the effect of changing the catchment behaviour.
2. The Hydrology and Hydraulic Report prepared by SINCLAIR KNIGHT MERZ (SKM) in 1993 analysed each of the trunk drains crossing the new Marshalling Yards in terms of drainage capacity and flooding impacts. The report found that generally the trunk stormwater infrastructure was under capacity for events in excess of 10 year ARI event.

The culvert that is critically under capacity is Cox's Creek channel, which results in 134m³/s needing to flow overland through the Enfield Marshalling yards in the 100 year ARI event. Overland flow from upstream catchment would also add to this.

Additionally, the 1993 SKM report discussed significant flooding on the upstream side of Enfield Marshalling Yards where culverts commence. The Cooks River and Cox's Creek Flood Study completed by Council in 2010 and complaints from surrounding properties verify that flooding is common in the low points of Roberts Road and Wentworth Street.

Flooding in the above mentioned areas is due to the inadequate capacity of the downstream box culverts through the Enfield Marshalling Yards and blockage of the overland flow path by raised railway embankment along the western boundary of the Marshalling Yards.

3. The Intermodal Logistic Centre development also involves re-grading of the site so that more of the runoff tends to flow towards the southern end of the site and Cox's Creek. In general, the total amount of impervious surface of the site will significantly increase and a large proportion of the flow will be diverted to the main carrier of Cox's Creek which is already under capacity.
4. The development involves cut and fill modifications in sections of the floodplain that would normally be inundated during overland flows. This may potentially modify the overland flow path of Cox's Creek.
5. Surface runoff from upstream properties has not been catered for, obstructions that cause damming and backwater effects on the upstream properties are not permitted. Adequate surface flow paths shall be provided to convey all flows to the 1 in 100 year standard.
6. Raising of the surface ground levels above predevelopment levels is not acceptable as it will have adverse impact on the overland flow path and flooding of the site and adjoining properties.
7. The proposed method of stormwater runoff management outlined in SKM report and shown on Fig. 3 does not meet Council's standard requirements and is not acceptable. Stormwater runoff from each sub-catchment shall be collected and discharged to the existing downstream drainage culvert via the On-site Stormwater Detention Storage. Diversion of flows to southern end of the site and discharge of stormwater runoff to Cox's Creek, which is already under capacity, is not acceptable.

ATTACHMENTS

Attachment 1: Concept Layout (from Environmental Assessment (SKM) which forms part of 'terms of approval' in 5/9/07 Project Approval)

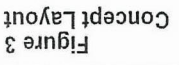
Attachment 2: Design Layout - Landscape (from Environmental Assessment (SKM) which forms part of 'terms of approval' in 5/9/07 Project Approval)

Attachment 3: Layout & Key Features (prior to Modification 1 & 2)

Attachment 4: Concept Layout Design (from Sydney Ports Presentation, Jan 2010 - subsequent to Modification 1 & 2)

Attachment 5: (Figure 3) Revised Site Layout (Mod 6) - 20/4/12

Attachment 6: Plan of Proposed Subdivision (Mod 6) – April 2012



Strathfield Council Submission, June 2012 - Enfield ILC, Modification Request No 6 2012

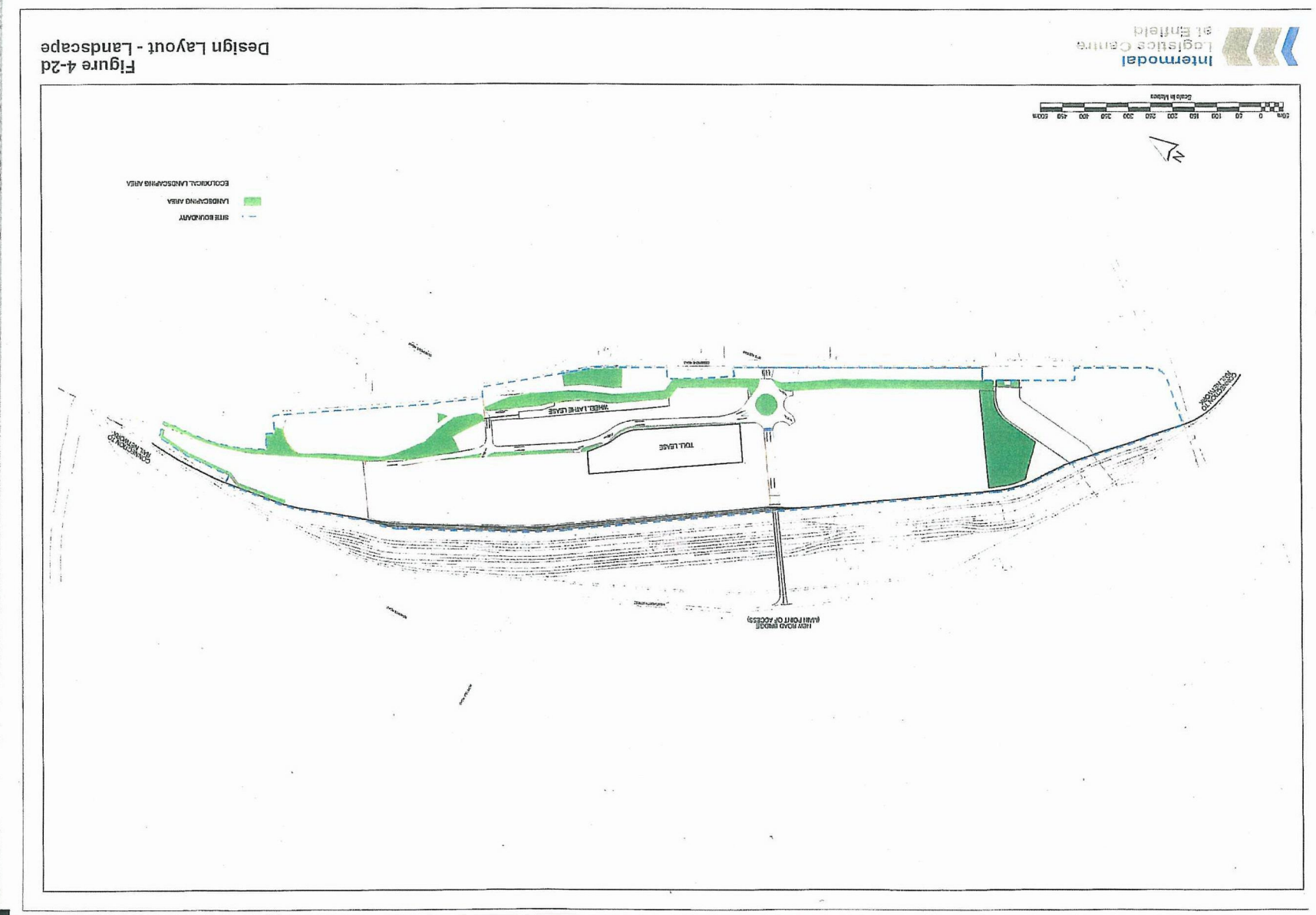


Figure 4-2d
Design Layout - Landscape

Attachment 2: Design Layout - Landscape (from Environmental Assessment (SKM) which forms part of terms of approval' in 5/9/07 Project Approval)

GREENACRE

Green and Golden Bell Frog ponds and foraging area

Stormwater detention basins

Ecological and Community area with controlled access

No ILC access to/from south Cosgrove Road to Punchbowl Road

Tarpaulin Shed to be adapted for reuse or relocated

Entrance

WAREHOUSING A

WAREHOUSING B

EMPTY CONTAINERS AREA

WAREHOUSING C

LEASED

SMALL WAREHOUSING D

WHEEL LATHE LEASE

ADMIN

LIGHT INDUSTRIAL COMMERCIAL

NEW ENFIELD MARSHALLING YARDS

RAILWAY SIDING

INTERMODAL TERMINAL SITE

INTERMODAL LOADING AND UNLOADING

SITE F

New noise wall

New bridge

Main point of access

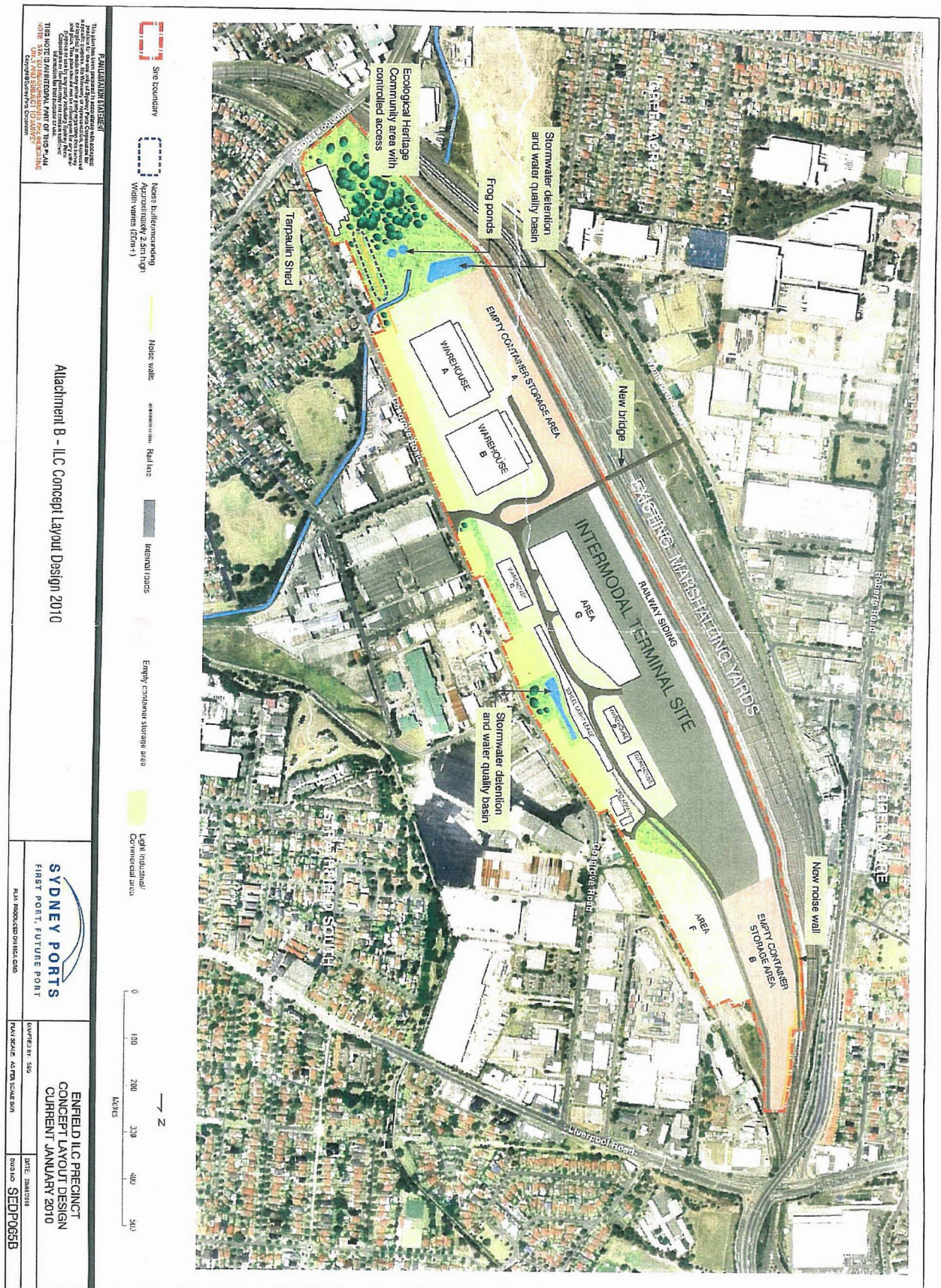
Robbers Road

DELPHIA ROAD

STRATFIELD BOULEVARD

COUGHLIN ROAD

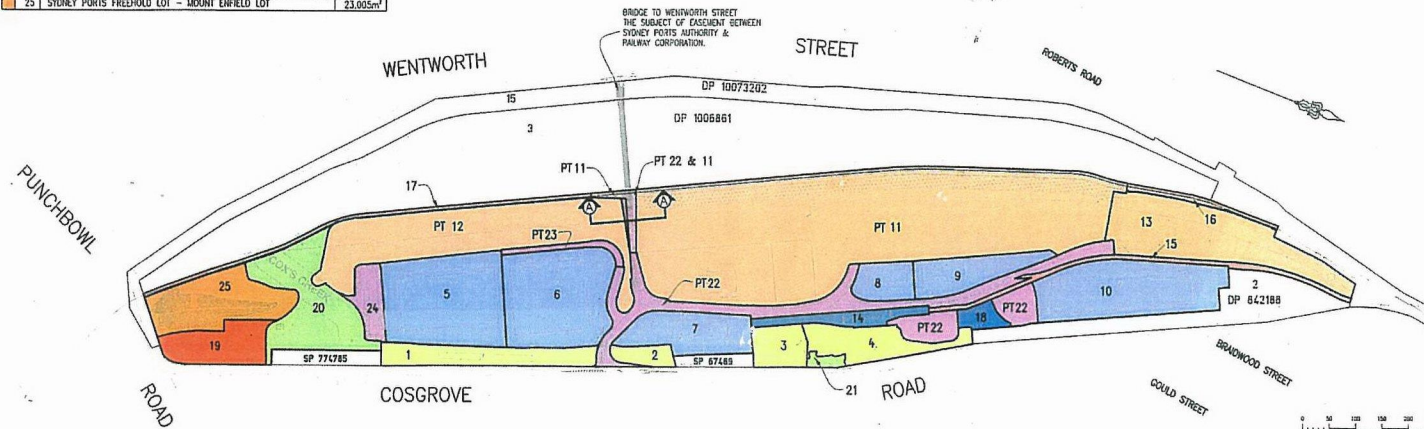
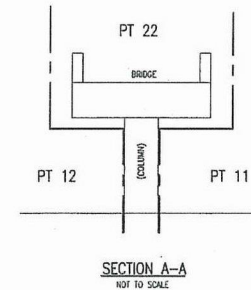




Attachment 4: Concept Layout Design (from Sydney Ports Presentation, Jan 2010 - subsequent to Modification 1 & 2)

LOT	DESCRIPTION	AREA
1	FREEHOLD LOT - LIGHT INDUSTRIAL/COMMERCIAL LOTS	14,995m ²
2	FREEHOLD LOT - LIGHT INDUSTRIAL/COMMERCIAL LOTS	4,191m ²
3	FREEHOLD LOT - LIGHT INDUSTRIAL/COMMERCIAL LOTS	7,798m ²
4	FREEHOLD LOT - LIGHT INDUSTRIAL/COMMERCIAL LOTS	14,013m ²
5	LEASEHOLD TENANT LOT - WAREHOUSE DISTRIBUTION	37,429m ²
6	LEASEHOLD TENANT LOT - WAREHOUSE DISTRIBUTION	35,747m ²
7	LEASEHOLD TENANT LOT - WAREHOUSE DISTRIBUTION	10,847m ²
8	LEASEHOLD TENANT LOT - WAREHOUSE DISTRIBUTION	7,868m ²
9	LEASEHOLD TENANT LOT - WAREHOUSE DISTRIBUTION	12,605m ²
10	LEASEHOLD TENANT LOT - WAREHOUSE DISTRIBUTION	34,397m ²
11	LEASEHOLD TENANT LOT - INTERMODAL TERMINAL AREA & ASSOCIATES SERVICE & STORAGE AREAS	170,149m ²
12	LEASEHOLD TENANT LOT - INTERMODAL TERMINAL AREA & ASSOCIATES SERVICE & STORAGE AREAS	53,925m ²
13	LEASEHOLD TENANT LOT - INTERMODAL TERMINAL AREA & ASSOCIATES SERVICE & STORAGE AREAS	38,328m ²
14	EXISTING LEASEHOLD TENANT LOT - WHEEL LATHE WORKSHOP	6,937m ²
15	SYDNEY PORTS FREEHOLD LOT - RAIL TRACKS	7,116m ²
16	SYDNEY PORTS FREEHOLD LOT - RAIL TRACKS	3,044m ²
17	SYDNEY PORTS FREEHOLD LOT - RAIL TRACKS	6,237m ²
18	SYDNEY PORTS FREEHOLD LOT - EXISTING ADMIN BUILDINGS	1,510m ²
19	SYDNEY PORTS FREEHOLD LOT - EXISTING TARPULIN FACTORY	13,542m ²
20	SYDNEY PORTS FREEHOLD LOT - VACANT LANDSCAPE	27,862m ²
21	SYDNEY PORTS FREEHOLD LOT - VACANT LANDSCAPE	1,647m ²
22	SYDNEY PORTS FREEHOLD LOT - ROADWAYS & INFRASTRUCTURE LOT (PARTLY IN STRATUM)	41,248m ²
23	SYDNEY PORTS FREEHOLD LOT - WOODSHED LOT	2,778m ²
24	SYDNEY PORTS FREEHOLD LOT - INFRASTRUCTURE LOT	7,035m ²
25	SYDNEY PORTS FREEHOLD LOT - MOUNT ENFIELD LOT	23,005m ²

PLAN OF PROPOSED SUBDIVISION OF THE
INTERMODAL LOGISTICS CENTRE
COSGROVE ROAD, ENFIELD



CONTRACT PLAN
Plan compiled from
architectural CAD data.

Plan is subject to final
survey after completion
of construction.

Surveyor: TASY MORAITIS
Date of Survey: / /
Surveyor's Ref: 120225

PLAN OF PROPOSED SUBDIVISION OF
LOT 2 DP 1006861, LOT 101
DP 1001498 & LOT 14 DP 1007302

LGA: STRATHFIELD
Locality: ENFIELD
Subdivision No:
Lengths are in metres. Reduction Ratio 1:5000(DAS)

REGISTERED

DRAFT PLAN
PRINTED 21 APRIL 2012
(ISSUE 3)

10mm 20 30 40 50 60 70 80 90 100 110 120 130 140 150 Scale of mm

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