

Our ref: F2006/00621

1 July 2013

Ingrid Ilias
Environmental Planning Officer
Major Project Assessments
Department of Planning
23-33 Bridge Street
SYDNEY NSW 2000

Dear Ingrid

**RE: PATRICKS CONTAINER TERMINAL (DA-453-12-2002-MOD7)
ENVIRONMENTAL ASSESSMENT**

Thank you for your letter received by Council on 12 June regarding the Patricks Port Botany Modification request number 7 inviting Council to comment on the June 2013 Environmental Assessment (EA) prepared by GHD, proposing improvements upgrades and relocations of facilities and utility services on site as required to automate the straddle carriers.

Noise nuisance complaints from the Port related operations are received by Council from residents located in Matraville, Chifley and Little Bay locations, particularly in streets located on elevated topographies. The following key activities have been identified as potentially requiring acoustic attenuation: loading and unloading of equipment; dropping off/pick up of containers and impacts from reversing alarms.

Given this context Council has reviewed the Environmental Assessment and provides the following comments.

Alarm minimisation

Council welcomes the new automated straddle carriers that as outlined in the EA will have no reversing alarms and will be shut down when not in use reducing idling noise overall reduction in operational noise. We note its implementation within 16 months and urge its further prioritisation if possible.

Increased Noise Levels during construction

The EA states that there will be increased noise levels during construction. As local residents are already concerned with current noise levels Council would like to see a commitment by Patricks in the Construction Environmental Management Plan (CEMP) to undertake measures to reduce noise levels beyond noise limit compliance especially during night time and weekends.

Night time operation- Construction Noise

The proposed development outlines construction works that may be required to be undertaken during the night time period (6-10pm) these works should be restricted to essential works. It is also recommended that an additional acoustic monitoring be undertaken with the night time construction activities to demonstrate compliance with the relevant noise limits.

Noise monitoring

The EA was determined through predicted noise modelling. Whilst predicted noise modelling is beneficial, it can not be certain that the measurements submitted will be accurate at all times during the construction phase. To ensure that the compliance is achieved at all times it's recommended that monthly noise and vibration monitoring is undertaken during the day and night time over the sixteen month period to verify the development complies with the relevant requirements. This monitoring should be undertaken by an independent suitably qualified Environmental Consultant in acoustics. The report should also be made available online for assessment by relevant authorities and the general public in a commitment to transparency. We note that these requests were followed by Sydney International Container Terminals Limited (SITL).

Offsite impacts of heavy vehicles during construction phase

With the proposed construction activities, Council is concerned that there may be a need for the trucks to be stacking outside the terminal area prior to loading and unloading.

Council would appreciate details of provision of onsite truck waiting facilities in the CEMP to ensure the construction works do not impose unnecessary impacts on the local road network.

Council understands an Operational Environmental Management Plan (OEMP) is to be developed for the Patricks site; Council would like to see the commitments in this plan captured by a review of the Environmental Protection licence 6962 to ensure ongoing monitoring and compliance.

Council hopes these comments are of assistance in the development of Construction Environmental Management Plans and the Operational Environmental Management Plan. Council also looks forward to the opportunity to review and provide feedback on these plans.

Should you have any further questions regarding the issues raised in this submission, please contact Bronwyn Englaro, Senior Sustainability Officer on 9399 0796.

Yours sincerely,



Karen Armstrong

Manager Strategic Planning