



DOC20/685169

24 August 2020

Mr Nathan Stringer  
Senior Planning Officer  
Social and Other Infrastructure Assessments  
Department of Planning, Industry and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Mr Stringer

**Moorebank Intermodal Precinct West Stage 2 –  
Modification 1 – Building Height Increase (SSD 7709 Mod 1)  
EPA Advice on Modification**

I am writing to you in reply to your invitation to the Environment Protection Authority (EPA) to provide advice on the above modification request. The EPA notes that the request runs concurrent with a separate modification application to adjust the operational boundary and building heights for the Moorebank Intermodal Precinct West (MPW) Concept and Stage 1 consent (SSD 5066 Mod 2).

Both modifications involve an increase in the maximum building height established across selected portions of the site from 21 metres to 45 metres and amendment to internal site boundaries. SSD 7099 Mod 1 also involves amendment to the operational noise criteria stipulated in Table 4 of condition B131, noting that no such criteria were established under SSD 5066.

The EPA reviewed the *Modification Application Planning Report*, prepared by Willowtree Planning, dated 21 July 2020, Appendix 10 – *Noise and Vibration Impact Assessment*, prepared by Renzo Tonin and Associates, dated 8 July 2020 (the NVIA), and Appendix 11 – *Operational Noise Management*, prepared by Renzo Tonin and Associates, dated 30 June 2020 (the ONM) submitted to support the request to modify condition B131. The EPA has also considered other noise assessment documents including from the original Environmental Impact Statements (EIS) and Response to Submission (RtS) for SSD 7709 and the noise and vibration impact assessment for the Moorebank Intermodal Precinct Stage 3 (SSD 10431) currently under assessment.

It should be noted that the EPA has previously raised concerns regarding the lack of information provided in noise impact assessments for planning approvals across the Moorebank Intermodal site, to make a full and informed assessment of the potential operational and cumulative noise impacts from the proposal. The conditions of consent for SSD 7709 attempted to address these concerns, with the noise limits in the consent based on cumulative level for both the Moorebank Intermodal Precinct West (MPW) and Moorebank Intermodal Precinct East (MPE) sites.

However, the current noise limits are set below the predicted noise levels and are not based on the Project Specific Noise Levels (PSNL) derived under the then-applicable *Industrial Noise Policy 2000* (now superseded by the *Noise Policy for Industry 2017*). The current daytime noise limits in the consent appear to be based on the night-time predicted noise level for the MPW Stage 2 amended proposal, and the evening and night-time noise limits are the minimum PSNL. The EPA considers

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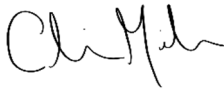
that the resulting noise limits are not achievable for MPW, nor are they achievable for the cumulative MPW and MPE sites.

The EPA reviewed the NVIA that was undertaken to assess the construction and operational noise impacts associated with the modification to the warehouse and distribution facilities. The NVIA explores feasible and reasonable mitigation measures in an attempt to achieve the current noise limits in the consent for MPW (SSD 7709), however as noted, the noise limits are unachievable as they were set below the predicted noise levels in the EIS.

The ONM document provides a review of noise levels outlining what is cumulatively achievable across the MPW and MPE site. The approach proposed in the ONM is reasonable and in line with current policy. The EPA considers that the building height increase proposed by the modification could meet the proposed new noise limits also proposed in the modification, provided that the noise mitigation measures outlined in the NVIA are adopted.

The EPA would be pleased to discuss this advice further with DPIE. To arrange a meeting, please contact Anna Timbrell on 9274 6345 or email [anna.timbrell@epa.nsw.gov.au](mailto:anna.timbrell@epa.nsw.gov.au)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miles', with a stylized, cursive script.

**CLAIRE MILES**  
**Unit Head, Regional Operations – Metro North**  
**Environment Protection Authority**