

ASSESSMENT REPORT

Enfield Intermodal Logistics Centre MP05_0147 (MOD 11)

1. BACKGROUND

This report is an assessment of a request to modify the Project Approval (MP 05_0147) for the Enfield Intermodal Logistics Centre (ILC).

The request has been lodged by TFA Project Group on behalf of NSW Ports (the proponent), pursuant to Section 75W of the *Environmental Planning and Assessment Act 1979* (EP&A Act). It seeks approval to establish an additional warehouse (Warehouse G) on the site.

2. SUBJECT SITE

The Enfield ILC is located at Cosgrove Road, Strathfield South, and is wholly located within the Strathfield local government area (LGA) and partly adjoins the Bankstown LGA along its north-western boundary. The site is surrounded by the suburbs of Greenacre and Chullora to the east, Belfield to the south, Rookwood to the north and South Strathfield to the east (refer to **Figure 1**).

The Enfield ILC contains an intermodal terminal for the loading and unloading of containers between road and rail and the short term storage of containers, with a capacity to handle 300,000 twenty-foot equivalent units (TEU) per annum. It also includes railway lines, empty container storage facilities and associated infrastructure.

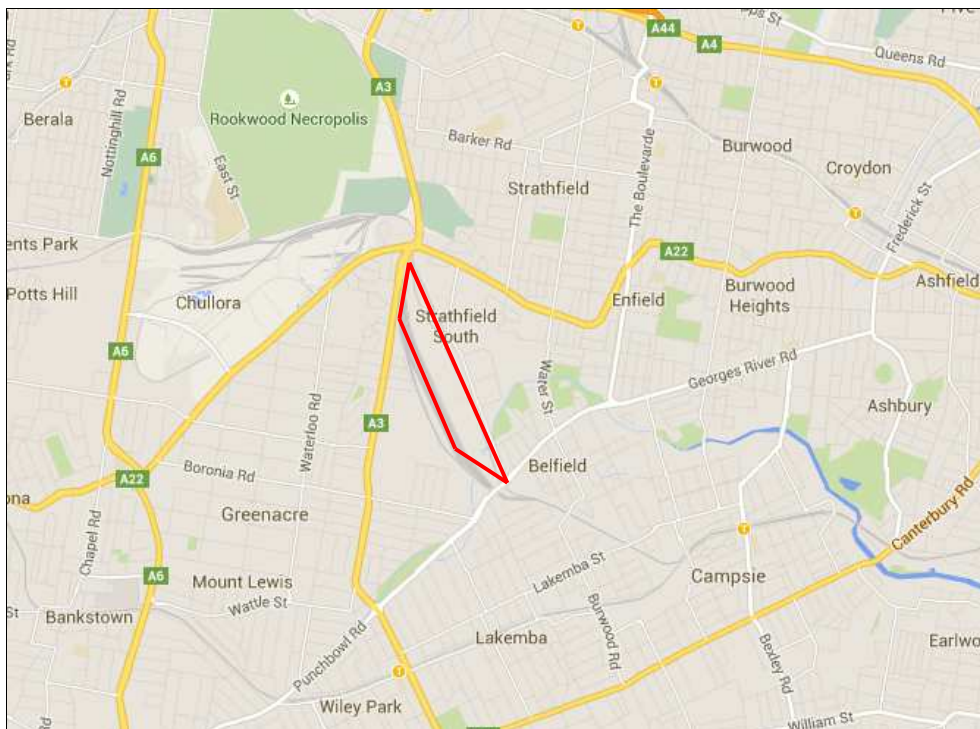


Figure 1 – Site Location

3. APPROVAL HISTORY

On 5 September 2007, the Minister for Planning approved a Project Application (MP 05_0147) for the construction and operation of the Enfield Intermodal Logistics Centre with a capacity to accept a maximum throughput of 300,000 TEU (one TEU is equivalent to one twenty foot container) per annum. Key aspects of the approval include:

- demolition of existing buildings and structures;
- earthworks and drainage;
- intermodal terminal for loading/unloading containers;
- rail sidings, railway lines and associated works to connect to existing freight line;
- warehousing for packing/unpacking of containers and short term storage of cargo;
- empty container storage facilities;
- light industrial/commercial area fronting Cosgrove Road;
- access works including a new road bridge over the marshalling yards; and
- internal roads, administration buildings LPG and fuelling facilities, container washdown, vehicle maintenance shed and site services.

The approved site layout is shown in **Figure 2**.



Figure 2 – Approved Site Layout

This Project Approval has been modified on six occasions, and is also the subject of three other modification applications yet to be determined. **Table 1** provides a summary of the modifications.

Table 1: Summary of Modifications

MOD	Modification	Determination
1	Amend conditions relating to construction dust monitoring	7 October 2008
2	Amendment to conditions to enable staged construction and operation and modified timing of submission of Site Audit Statements.	30 March 2009
3	Replace approved warehouse with a car load/unload facility.	Withdrawn
4	Amendment of conditions relating to noise walls, internal roads, stormwater detention, development areas and site layout.	27 May 2010
5	Relocation and reuse of unsuitable material to the southern part of the site known as Mount Enfield.	10 November 2011

6	Inclusion of the former Toll Lease Area into the project site, adjustments to site layout, subdivision and changes to meteorological monitoring.	12 December 2012
7	Modify the subdivision of the ILC site.	Withdrawn
8	Amendment of the subdivision layout into 23 allotments to facilitate commercial leasing.	27 November 2013
9	Proposed use of Site F for agricultural and forestry commodities storage and handling facility.	Sears Issued
10	Amendment to freight-related operational activities within the intermodal terminal.	Under Assessment
12	Extension of rail sidings and expansion of administration building.	Under Assessment

As noted above, the Project Approval includes the construction and operation of six warehouses (A to F) for the purposes of freight handling, container handling, temporary freight storage and/or packaging/repacking, or for activities ancillary to these uses, or the intermodal terminal and empty container storage areas (refer to **Figure 2**).

MOD 6 is relevant to the subject proposal as the proposed modification will result in part of the new warehouse (Warehouse G) being constructed within the former Toll site area (**Figure 3**).

MOD 6 is relevant to the subject modification application. In 2012, Sydney Ports Corporation (former Proponent of this Project Approval) sought to modify the Project Approval to include the former Toll Lease Area (the Toll site) as part of the approval site. The Toll site (refer to **Figure 3**) had been previously excluded from the approval as it operated as a transport logistics centre and it was assumed that the use would operate independently of the ILC operations, and as the use is inconsistent with the strategic intention of the ILC, being to reduce truck movements on Sydney's roads. MOD 6 incorporated this land into the site, but to ensure there would be no intensification of the transport logistics use, the modified approval required operations on this part of the site must remain generally consistent with the former operations as a transport logistic centre. The MOD 6 approval also broadly identified the range of construction works that Sydney Ports Corporation intended to undertake on the former Toll site.

4. PROPOSED MODIFICATION

The Proponent lodged a section 75W modification application seeking approval to establish an additional warehouse (Warehouse G) in the southern portion of Area G (Lot 23). It is immediately adjacent to the intermodal terminal area allowing for direct access to containers from the intermodal terminal area. As described above, the warehouse footprint would also fall partially within the area known as the former 'Toll Lease Area' site (refer to **Figure 3**).

Key aspects of the proposal include:

- construction of a warehouse including a workshop, wash bay, office, and ancillary staff amenities with a building footprint of approximately 3,300 sqm;
- minor excavation work will be undertaken for the installation of services and footings;
- provision of a staff parking area; and
- a new crossover from Mainline Road to separate light vehicle and existing heavy vehicle movements accessing the area; and
- associated removal of two trees and additional landscaping.

The additional warehouse is proposed to be consistent with the use of other approved warehouses on the site (Warehouses A to F) which may be used for *"the purposes of freight handling, container handling, temporary freight storage and/or packaging/repacking, or for activities ancillary to these uses, or the intermodal terminal and empty container storage areas"* (refer to condition 1.6 of the Project Approval).

To address concerns the proposed warehouse could result in an intensification of the transport logistics use of the former Toll lease area, the proponent has confirmed this modification application does not propose to change the use of the former Toll site as a “container storage depot and transport logistics centre” or to expand the former Toll operations into any other area of the site.

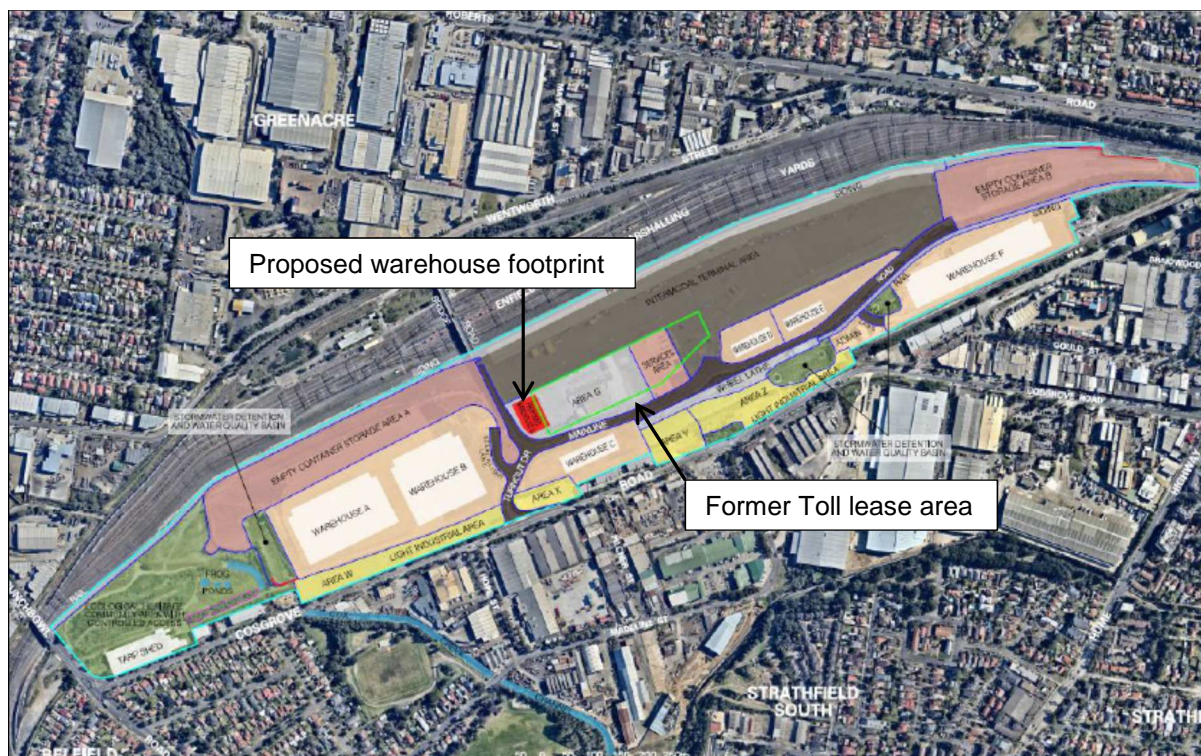


Figure 3 – Proposed Warehouse

5. STATUTORY CONSIDERATION

5.1 Section 75W

The application was originally approved under Part 3A of the EP&A Act. Although Part 3A was repealed on 1 October 2011, the project remains a ‘transitional Part 3A project’ under Schedule 6A of the EP&A Act, and hence any modification to this approval must be made under the former Section 75W of the Act.

The Department is satisfied that the proposed changes are within the scope of Section 75W of the EP&A Act, and do not constitute a new application.

5.2 Approval Authority

The Minister for Planning is the approval authority for the application. However, under delegation the Director, Modification Assessments, may determine the Section 75W modification request, as:

- the relevant local councils have not made an objection; and
- a political disclosure statement has not been made; and
- there are no public submissions in the nature of objections.

6. CONSULTATION

The Department publicly exhibited the proposal and also consulted with Strathfield Council (Council) and Canterbury Bankstown Council, Transport for NSW (TfNSW) and Roads and Maritime Services (RMS) about the proposed modification. The Department also notified landowners of the application.

Strathfield Council raised no objection to the proposal on the basis there would be no increase in throughput capacity. Strathfield Council reiterated its concerns in relation to a separate modification application MOD 10 seeking approval for amendments to increase truck based freight related operational activities. These issues are being assessed separately by the Department under MOD 10.

Canterbury Bankstown Council also raised no objection to the proposal.

No concerns were raised by **TfNSW** or **RMS** about the proposed modification.

No **public** submissions were received objecting to the proposal.

7. ASSESSMENT

The key assessment issues associated with the proposal have been considered in **Table 3**.

Table 3: Assessment Issues

<i>Issue</i>	<i>Consideration</i>	<i>Recommendation</i>
<i>Built Form</i>	<ul style="list-style-type: none">The proposal seeks approval to construct a new warehouse with maximum height of 12 metres with a maximum footprint of 3,300 sqm.There will be minimal visual impacts associated with the proposal as the new warehouse would be consistent with the height, bulk, scale and appearance of existing and approved development on the site.Further there will be no adverse amenity impacts as the new warehouse would be located centrally within the site adjoining other industrial development associated with the ILC and therefore would be barely discernible from outside of the site.The Department notes the Proponent is required to submit final design plans of the warehouse to the Secretary for approval before the commencement of construction in accordance with existing Condition 1.8 of the Project Approval.The Department is satisfied with the built form of the proposal as it is consistent with the industrial character of the site.	No additional conditions or amendments necessary.
<i>Traffic Impacts</i>	<ul style="list-style-type: none">Condition 1.5 of the Project Approval establishes a maximum throughput of 300,000 TEU (twenty foot equivalent units) per annum.The proposed warehouse would not affect the approved maximum throughput of 300,000 TEU per annum, and as such would not generate any additional traffic movements beyond that previously assessed and approved for the Enfield ILC.As the proposed warehouse is located adjacent to the intermodal area it may also reduce the number of internal forklift and truck movements on the site.No concern was raised by Council or RMS in relation to traffic generation.The Department is therefore satisfied the proposal would not result in any additional traffic impacts beyond those already assessed and approved.	No additional conditions or amendments necessary.

<i>Car Parking</i>	<ul style="list-style-type: none"> The proponent has advised car parking for employees will be provided within the Toll Site adjacent to the proposed warehouse or the within intermodal terminal area. It has also advised parking would be provided at the rate of 1 space per employee during peak times plus 10 per cent to ensure there are no parking impacts on the surrounding area. The Department is satisfied there is ample space within the site to provide appropriate on-site parking to meet demand. 	No additional conditions or amendments necessary.
<i>Noise Impacts</i>	<ul style="list-style-type: none"> The noise associated with the future use of the warehouse includes operation of forklifts and air compressors/generators as well as general container handling. The majority of the noise will be generated inside the proposed building. The Project Approval includes conditions relating to operational noise management and sets maximum noise criteria in accordance with the NSW Industrial Noise Policy. The Department is satisfied that the proposed modification would not result in any external noise impacts beyond those already assessed and approved in the original Project Application and the existing conditions would appropriately manage potential noise impacts associated with the future use of the warehouse. 	No additional conditions or amendments necessary.
<i>Contamination</i>	<ul style="list-style-type: none"> The Proponent advises that a Baseline Contamination Assessment was undertaken in 2013 for Area G, which is the site of the proposed warehouse. The assessment confirmed the proposed warehouse site is free from contamination. Since that time there have been no known incidences of pollution (e.g. fuel spill, storage of material) that would potentially lead to a change to the findings in the previous contamination assessment. There are no known contamination risks associated with the construction or operation of the proposed warehouse. The Department also notes the Project Approval includes appropriate conditions relating to contamination, remediation and asbestos management. On this basis, the Department is satisfied the proposal is acceptable. 	No additional conditions or amendments necessary.
<i>Stormwater Management</i>	<ul style="list-style-type: none"> The site is currently serviced by an existing stormwater system, which includes three stormwater detention basins that capture retain and treat stormwater before it is discharged from the site. Any potential accidental spill associated with the operation of the warehouse would be contained within the first flush containment basin by isolation valves to ensure any spill is appropriately contained. The Department also notes the site is currently paved, therefore, the volume of additional runoff associated with the new warehouse would be negligible. The Department is satisfied there are appropriate stormwater management measures in place to ensure there would be no adverse additional impacts to stormwater runoff or water quality. 	No additional conditions or amendments necessary.
<i>Landscape</i>	<ul style="list-style-type: none"> Two Melaleuca trees will be removed to make way for a new crossover off Mainline Road to the warehouse site. The trees are not highly significant in that they are less than 10 metres in height and do not form part of an ecological community. Condition 6.39(d) of the Project Approval requires all tree removal works to be in accordance with a Landscape and Ecological Area Management Plan. The Department notes that additional trees will be planted as part of a continuous strip of landscaping along the frontage of the site. The Department is satisfied the approved landscape measures would offset the removal of two trees on the site. 	No additional conditions or amendments necessary.

<i>Hazardous and Dangerous Goods</i>	<ul style="list-style-type: none"> • The proposal does not seek approval to pack, repack or decanter dangerous goods within the proposed warehouse. • The Department notes condition 1.7 of the Project approval does not allow dangerous goods to be packed, repacked, or decanted without a further risk assessments being undertaken and approved by the Secretary. • The Department is satisfied the existing condition would appropriately manage potential hazards and risks associated with the future operation of the warehouse. 	No additional conditions or amendments necessary.
<i>Construction Impacts</i>	<ul style="list-style-type: none"> • The Department has considered the potential construction impacts associated with the proposal and notes the existing approval contains a suite of conditions which would appropriately mitigate construction impacts, including requirements for a: <ul style="list-style-type: none"> • Construction Environmental Management Plan; • Construction Traffic Management Plan and Protocol; • Construction Noise Management Plan; • Construction Dust Management Protocol and Construction Dust monitoring; and • construction noise mitigation and restricted hours of construction. • The Department is therefore satisfied appropriate safeguards are in place to mitigate and manage potential construction impacts. • The Department also notes the site is isolated from adjoining properties, therefore, the potential for adverse construction impacts external to the site is low. 	No additional conditions or amendments necessary.

8. CONCLUSION

The Department has assessed the modification application and supporting information in accordance with the relevant requirements in the EP&A Act. The Department's assessment concludes that the proposed modification is appropriate on the basis that it would:

- not affect the maximum throughput capacity of 300,000 TEU per annum;
- not result in any additional external traffic impacts on the surrounding road network above the approved current operation;
- not expand the former Toll operations into other parts of the site;
- not alter the noise impacts to the surrounding area beyond those already assessed and approved in the original Project Application; and
- complement the intermodal terminal by providing freight and container handling and storage activities consistent with the approved warehouse uses on the site.

9. RECOMMENDATION

It is recommended that the Director, Modification Assessments as delegate for the Minister for Planning:

- consider the findings and recommendations of this report;
- approve the modification under Section 75W, subject to conditions; and
- sign the attached notices of modification (**Appendix A**).

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Endorsed by:

Approved by:

Natasha Harras
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Modification Assessments

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APPENDIX A: NOTICE OF MODIFICATION

The Notice of Modification can be found on the Department's website at the following address:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7966

APPENDIX B: SUPPORTING INFORMATION

The following supporting documents and supporting information to this assessment report can be found on the Department of Planning and Environment's website as follows:

1. Modification request

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7966

2. Submissions

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7966