

16 December 2016

Jane Flanagan
Major Project Assessment Team
Department of Planning & Environment
GPO Box 39,
Sydney NSW 2001

Also by email: jane.flanagan@planning.nsw.gov.au

Dear Ms Flanagan,

RE: MP 05_0147 MOD 12 Modification to Enfield Intermodal Logistics Centre (ILC)

Council has received the documentation associated with the exhibition of Modification Request No.12 for the Enfield Intermodal Logistics Centre (MP 05_0147).

In summary, the proposed modification involves:

- Extension of two existing rail sidings to connect through to the main through rail line, resulting in an additional 600m extension to each of the sidings;
- Approximately 250sqm of additional office space.

The supporting Environmental Assessment indicates that the extension to the existing rail sidings will improve the operational efficiencies for trains accessing the site, including loading and unloading, and providing the additional "standing room" to service the longer freight trains whilst access to the main through rail line is maintained. Furthermore, the Enfield ILC operator requires additional office space to cater for operations and current and future staffing levels.

Having reviewed the modification request, Council now provides the following comments:

1. Cumulative impact of modifications

Numerous modifications to the expected layout and operational arrangements for the ILC have been approved since the original Part 3A Approval of September 2007.

While the modifications to date may seem minor in isolation, Council is concerned that the extent of change over time does not represent substantially the same development as the original approval. Council is therefore concerned that the cumulative impact of the various modifications represents a greater impact than those anticipated and assessed in the original approval.

Given the impact assessment for this modification relies heavily on the findings of studies prepared for the original approval, Council is of the view that the validity of the original assessment to current operational and layout plans should be reviewed to ensure original findings remain relevant.

This is particularly pertinent in the context of residential intensification, traffic growth and demographic changes across both the LGA and the sub-region, where the modelling supporting the 2007 Part 3A approval may well be out-dated. In this context, a review of the need to substantially update the background studies supporting the ILC approval should also be undertaken. In particular a review of the traffic and acoustic impacts are likely to be required.

2. Extension of Rail Sidings

Council is concerned about the proposed extension of the rail sidings to the south due to the proximity to adjacent residential areas and the potential amenity impacts. Impacts of concern include:

- Acoustic impact during construction and operation (see comments below);
- Failure of the application to assess additional lighting needs and potential light spill during construction and operations.

While modification 12 states that the proposed extension of the rail sidings into the empty container storage area is to "*provide a wagon storage area for pre-loaded and out of service rail wagons*" Council is concerned that the siding extension alongside the container storage areas will encourage the use of these areas for overflow loading and unloading of containers. This use would be contrary to the original approval and constitute a use of the site that is substantially different to the original approval (i.e. empty container storage area). Any modification approval should include a condition limiting intermodal activities to the Intermodal Terminal Area only.

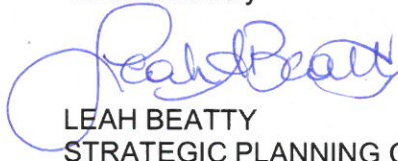
3. Acoustic Impact

The acoustic assessment report finds that noise levels during construction may exceed the relevant noise criteria at 2 Wentworth Street and at the western end of Blanche Street.

Council requests that residents in the affected areas be given reasonable notification of works that exceed the noise criteria, their duration, total building time, provisions for minimising noise at these times and notice of when respite periods will occur. Notifications should also include an accessible contact point for complaints.

Should you have any questions regarding this letter, please do not hesitate to contact Strategic Planning section on 9748 9999.

Yours sincerely



LEAH BEATTY
STRATEGIC PLANNING COORDINATOR