

20 December 2016

Ms Anthea Sargeant  
Executive Director  
Key Sites and Industry Assessments  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Attn: Jane Flanagan

Dear Ms Sargeant,

**RE: Response to Submissions – MP 05\_0147 MOD 12 – Modification to Project Approval – Enfield Intermodal Logistics Centre**

Thank you for your correspondence of 16 December 2016 which provided the last of the submissions for Modification 12 (MP05\_0147 MOD 12) to the Project Approval for the Enfield Intermodal Logistics Centre (Enfield ILC).

Submissions were received from Roads and Maritime Services (RMS), NSW Office of Environment & Heritage (OEH), Strathfield Council, City of Canterbury Bankstown Council, and the NSW Environmental Protection Authority (EPA). It is noted that no objections to the proposed modification were received in the submissions.

On behalf of NSW Ports, Attachment A provides a response to the issues raised by submissions.

The response demonstrates that the Modification 12 proposal would not result in any additional environmental impacts beyond those assessed and approved for the Enfield ILC.

If you have any questions regarding the response, please do not hesitate to contact me on (02) 8814 5219 or at [greg.walls@tfa.com.au](mailto:greg.walls@tfa.com.au).

Kind regards,



Greg Walls  
**Senior Town Planner**  
**TFA Project Group**

**Attachment A – Response to Submissions**

Issue	Concern Raised	Response
Noise	Canterbury Bankstown Council: <ul style="list-style-type: none"> <li>Noise Management Plan to be submitted to the satisfaction of Canterbury-Bankstown Council prior to construction works.</li> </ul>	<ul style="list-style-type: none"> <li>The Enfield ILC currently operates under an overarching Construction Noise Management Plan which has been approved by the Department of Planning and Environment (DPE) as part of the broader Construction Environmental Management Plan (CEMP).</li> <li>The CEMP is available on the NSW Ports website at <a href="http://www.nswportsbotany.com.au/projects-and-planning/ilc-at-enfield/">http://www.nswportsbotany.com.au/projects-and-planning/ilc-at-enfield/</a></li> <li>The CEMP, including the Construction Noise Management Plan, addresses the potential impacts of rail construction works and the works proposed will be undertaken in accordance with this Plan. It should be noted that the Overarching Operational Environmental Management Plan (OEMP) has also been approved by DPE and is available on NSW Ports' website.</li> </ul>
	Strathfield Council: <ul style="list-style-type: none"> <li>Acoustic impact during construction and operation.</li> <li>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.</li> <li>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</li> </ul>	<p>Construction:</p> <ul style="list-style-type: none"> <li>The Noise Impact Assessment (NIA) states in relation to construction noise that: <i>"In practice, the noise levels are likely to vary due to the fact that plant would move about the worksites and would not all be operating concurrently at all times. As such, noise levels are likely to be lower than the worst-case noise levels presented in [the NIA] for most, and probably all, of the time during the works."</i></li> <li>NSW Ports will notify affected residents of works that may potentially 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 will include a contact point for complaints.</li> <li>The CEMP, including the Construction Noise Management Plan, addresses the potential impacts of rail construction works. The proposed works will be undertaken in accordance with this Plan.</li> </ul> <p>Operation:</p>

	<p>these times and notice of when respite periods will occur. Notifications should also include an accessible contact point for complaints.</p>	<ul style="list-style-type: none"> <li>Noise modelling was undertaken for the Noise Impact Assessment (NIA), with the adopted scenarios (being modified and refined scenarios from previous assessments) including consideration of train shunting activities associated with the proposed rail siding extensions.</li> <li>The NIA that was prepared for the proposed modification concluded that it is unlikely that there would be any exceedance of the operational noise limits identified in the existing conditions of approval.</li> <li>The NIA finds that the main noise contributor to proposed MOD 12 operational noise levels is from the movement and operation of reach stackers on the site. However, MOD 12 does not propose to increase the number of reach stackers nor change the locations in which they operate. All-be-it, reach stackers would operate slightly further away from sensitive receivers south west of the ILC as a result of MOD 12.</li> </ul>
Cumulative Modification Impacts	<p>Strathfield Council:</p> <ul style="list-style-type: none"> <li>Whilst the modification 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.</li> <li>Given the impact assessment for this modification relies heavily on the findings of studies prepared or</li> </ul>	<ul style="list-style-type: none"> <li>Under the proposed modification, the development remains substantially the same as originally approved i.e. an intermodal terminal with an annual throughput capacity of 300,000 TEU. All loading and unloading of trains would continue to occur within the intermodal terminal area.</li> <li>The proposed rail siding extensions, as stated in the Environmental Assessment for the Modification, are for the purpose of improving rail operations and access to the Intermodal Terminal (IMT) for loading and unloading in the IMT.</li> <li>While the proposed rail siding extensions extend the length of Empty Container Storage (ECS) Area A, loading and unloading of trains in ECS Area A is not proposed or intended under this modification.</li> <li>Loading and unloading of trains in ECS Area A would not occur without further modification to the project approval. Notwithstanding this, the ECS Area A has approval to store and handle containers in this area of the site using forklifts and trucks.</li> <li>The proposed modification does not propose to increase or alter operations in ECS Area A, other than utilising part of the area for the proposed rail siding extensions.</li> </ul>

	<p>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.</p> <ul style="list-style-type: none"> <li>A review of the need to substantially update the background studies supporting the ILC approval should also be undertaken.</li> </ul>	<p>The area available for handling empty contains in ECS Area A will be slightly reduced by the area excised for the rail siding extensions.</p> <ul style="list-style-type: none"> <li>It is considered that as the development is substantially the same as that which was originally approved with the same throughput, the studies undertaken to support the Enfield ILC Project Approval and subsequent Modifications remain current and relevant.</li> <li>An updated Traffic Assessment Report has been prepared in support of the Modification 10 Application. The key findings of MOD 10 Traffic Assessment are common to Modification 12.</li> <li>An updated Noise Impact Assessment was submitted in support of MOD 12 demonstrating that the noise impacts of the proposed modification are generally consistent with the conditions of approval for the project.</li> </ul>
Lighting	<p>Strathfield Council:</p> <ul style="list-style-type: none"> <li>Failure of the application to assess additional lighting needs and potential light spill during construction and operations.</li> </ul>	<ul style="list-style-type: none"> <li>No additional lighting is proposed at the rail siding extensions under this modification.</li> <li>Some lighting will be provided internal and external to the office building extension however the proposed office extension is suitably distanced from the boundaries of the site (and over 500 metres from residential areas). There is unlikely to be any light spill from the office building external to the site.</li> <li>Condition of Approval 2.46 requires that all external lighting installed as part of the project is mounted, screened, and directed in such a manner so as not to create a nuisance to surrounding land uses. All lighting installed on site to date complies with this Condition of Approval, as will external lighting to be installed in other areas of the site as those areas are developed.</li> </ul>
Heritage	<p>NSW Office of Environment and Heritage</p> <ul style="list-style-type: none"> <li>Potential impact on Tarpaulin Factory and Pillar Tank.</li> </ul>	<ul style="list-style-type: none"> <li>The Tarpaulin Factory and Pillar Tank are located in the southern area of the ILC site, near the corner of Punchbowl and Cosgrove Roads (refer to attached figure).</li> <li>The proposed works associated with Modification 12 are located more than 200 metres away from the heritage items on site and are not expected to have any adverse heritage impacts.</li> </ul>



