# REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

## MP05_0417 ENFIELD INTERMODAL LOGISTICS CENTRE (MOD 14)

07 SEPTEMBER 2017
FINAL
PREPARED FOR GOODMAN PROPERTY SERVICES PTY LTD

URBIS

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| Report Number | Request for Secretary's Environmental Assessment Requirements |

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# INTRODUCTION

This submission has been prepared by Urbis on behalf of Goodman Property Services Pty Ltd (the Proponent) with respect to major project approval MP05_0147 (the Approval). The Approval was issued on 5 September 2007 under Part 3A of the *Environmental Planning & Assessment Act 1979* (the Act) and granted development approval to the Enfield Intermodal Logistics Centre (the Enfield ILC).

The Enfield ILC includes the active Enfield Intermodal Terminal (IMT) currently operated by Aurizon, proposed empty container storage parks, an existing warehouse and tarp shed, dedicated ecological areas and 30 hectares of remaining developable industrial zoned land. The Approval included construction of seven warehouses with a total footprint area 109,300 sqm. To date, only one warehouse has been erected on site.

The Enfield IMT facilitates transfer of freight cargo received by rail from Port Botany to trucks for distribution to markets in inner and mid-western Sydney, or by rail to regional and / or interstate destinations. Containers (TEUs) received for distribution throughout Sydney are either transported to off-site importers via articulated truck or processed on-site with their contents then distributed via light truck to their end destination. The Enfield IMT has been approval to handle up to 300,000 TEUs per annum but currently operates with a throughput of approximately 50,000 TEU per annum.

This submission details a proposed modification (MOD 14) to the Approval pursuant to Section 75W of the Act, the operation of which is continued in respect of transitional Part 3A projects by Schedule 6A of the Act despite the repeal of Part 3A. The object of the submission is to facilitate the issue of the Secretary's Environmental Assessment Requirements (SEARs) by the Department of Planning & the Environment.

A key objective of this modification, MOD 14, is to provide operational flexibility and built form outcomes better suited to the needs of prospective tenants and operators. This will encourage uptake of spare capacity at the Enfield ILC by smaller users, facilitating the continued growth of container volumes and ensuring the commercial viability of the intermodal terminal. The long-term objective is to ensure rail freight volumes grow to become the predominant transport mode at the Enfield ILC.

MOD 14 seeks to modify the Approval in accordance with the concept masterplan prepared by land owner, NSW Ports, in collaboration with the Proponent. This will entail modification of built form parameters including modifications to site layout and approved building footprints to create 13 buildings encompassing 126,440 sqm as well as approval to increase the building heights to a maximum of 13.7 metres. A summary of the built form changes requested are detailed within Table 2.

Also proposed are modifications to operational parameters within select lots in response to market feedback received during consultation with potential tenants interested in leasing warehouse space, and using the rail service at Enfield ILC. Feedback suggests that further flexibility is required for the Enfield ILC to be a viable freight solution for prospective operators. A summary of the operational changes requested are detailed within Table 3. In summary these include:

- Extend 24/7 operating hours;
- Permit warehouse and distribution uses;
- Allow truck-to-truck freight movements for smaller sites with no direct interface with rail sidings.

It is anticipated that potential impacts arising from MOD 14 can be managed via the existing conditions of approval with minor amendments to be identified by the future Environmental Assessment (EA).

This SEARs request provides an overview of the following:

- The Enfield ILC site and surrounds;
- Part 3A Approval MP05_0147 and relevant modifications;
- The proposal;
- Relevant planning framework; and
- Key issues to be addressed by the EA.

# 1. THE SITE

## 1.1. BACKGROUND

The Enfield ILC site was first developed in 1916 as a steam locomotive depot known as the Enfield Marshalling Yards to support the Clyde Yard in Auburn, which had reached capacity. The Yard's operation as a depot ended in 1993. The western edge of the site was subsequently redeveloped as a new marshalling yard, owned by RailCorp and operated by Pacific National. NSW Ports purchased the balance of the vacant land progressively between 2001 and 2003.

Following the Approval of the Enfield ILC in 2007, early works commenced. Completed works include a 200-metre bridge, noise walls, north rail connection works on RailCorp land and construction of frog ponds. Civil works include site preparations of the empty container storage and warehouse areas, ramp pavement to the bridge, rail through-road, asphalt paving of the intermodal terminal area and installation of mains power to the site.

However, despite approval for the erection of seven warehouses with a total footprint area of 109,300 sqm, none has been developed. Feedback obtained via industry consultation suggests that users require further operational flexibility to allow the Approval to be fulfilled. All users (whether small or large) do not bring all goods in from Port Botany. Flexibility needs to be provided to allow goods to come to Enfield ILC from other destinations, and by other means of transport to support the movement of these goods.

MOD 10, which is currently being assessed by the DPE, proposes additional freight-related operational activities within select areas of the Enfield ILC. These additional activities include the transport, handling and storage of equipment and containers not linked with the rail interface; the transport of containers to and from the site by truck without a rail interface; and the transport of containers to and from the site via rail without a truck interface. Importantly, MOD 10 provides an emergency back-up service for lots with direct interface with the rail sidings in the event rail services are disrupted (Lot 11 & Lot 12). This guarantee of service is intended to lead to the growth in rail freight volumes, which are intended to be the predominant transport mode between Port Botany and the intermodal terminal.

A summary of past modifications sought in relation to the Enfield ILC is provided as Section 2.2.

## 1.2. SITE IDENTIFICATION AND SUBDIVISION

The Enfield ILC site is located within Strathfield South on the land generally bound by Cosgrove Road to the east, Punchbowl Road to the south, the Port Botany Freight Rail Line to the west and Roberts Road to the north. The Enfield ILC is approximately 15 kilometres from the Sydney Central Business District by road and 18 kilometres from Port Botany by rail. It covers an area of approximately 60 hectares and is approximately 0.5km in width and over 2 km in length.

The Enfield ILC has the legal description Lots 1 - 23 DP 1183316.

Refer to Figure 1 overleaf for context.

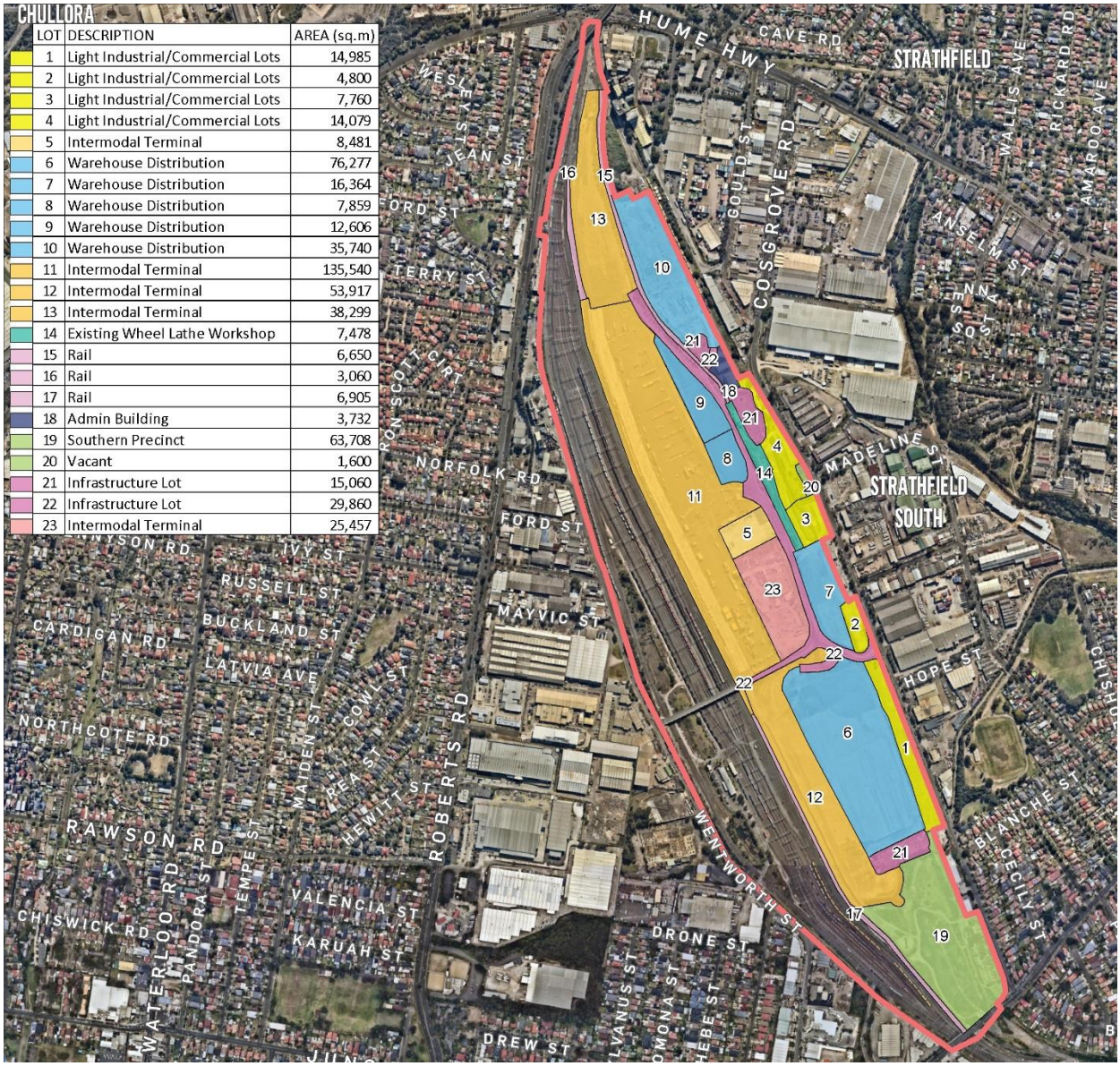
## 1.3. SURROUNDING USES

The site is surrounded by the suburbs of Greenacre and Chullora to the west, Belfield to the south, Rookwood to the north and South Strathfield to the east.

The Enfield ILC site is generally bound by the following uses:

- West: The New Enfield Marshalling Yard, railway line and rail siding and existing industrial development further to the west of Wentworth Street.
- East: Cosgrove Road and existing industrial development further to the east.
- North and South: Existing residential land on either side of Punchbowl Road to the south and to the north-west.

Figure 1 – Enfield ILC Location & Subdivision Plan




| LOT | DESCRIPTION | AREA (sq.m) |
|---|---|---|
| 1 | Light Industrial/Commercial Lots | 14,985 |
| 2 | Light Industrial/Commercial Lots | 4,800 |
| 3 | Light Industrial/Commercial Lots | 7,760 |
| 4 | Light Industrial/Commercial Lots | 14,079 |
| 5 | Intermodal Terminal | 8,481 |
| 6 | Warehouse Distribution | 76,277 |
| 7 | Warehouse Distribution | 16,364 |
| 8 | Warehouse Distribution | 7,859 |
| 9 | Warehouse Distribution | 12,606 |
| 10 | Warehouse Distribution | 35,740 |
| 11 | Intermodal Terminal | 135,540 |
| 12 | Intermodal Terminal | 53,917 |
| 13 | Intermodal Terminal | 38,299 |
| 14 | Existing Wheel Lathe Workshop | 7,478 |
| 15 | Rail | 6,650 |
| 16 | Rail | 3,060 |
| 17 | Rail | 6,905 |
| 18 | Admin Building | 3,732 |
| 19 | Southern Precinct | 63,708 |
| 20 | Vacant | 1,600 |
| 21 | Infrastructure Lot | 15,060 |
| 22 | Infrastructure Lot | 29,860 |
| 23 | Intermodal Terminal | 25,457 |

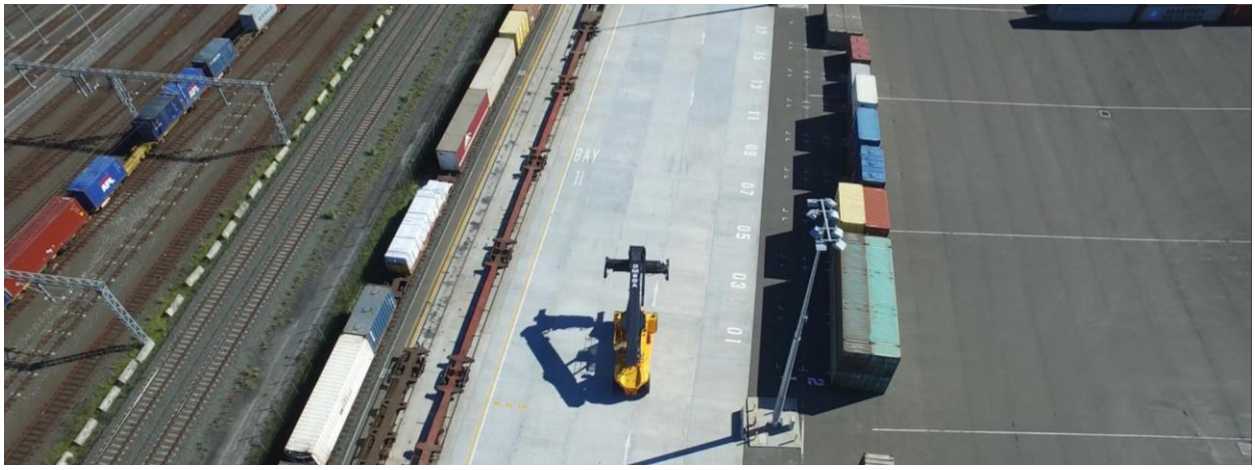
# 1.4. EXISTING DEVELOPMENT

The Enfield ILC will be one of the largest dedicated rail based intermodal logistics centre in NSW once fully developed. It is noted that the site is yet to be developed in accordance with the Approval with only a single warehouse existing on site, which predates the Approval. Empty container storage facilities are also yet to be constructed. In brief, existing development on the site comprises:

- Intermodal Terminal for the loading and unloading of containers between road and rail and short term storage of containers;
- A single warehouse for the packing and unpacking of containers and short-term storage of cargo for distribution by light truck;
- A Community and Ecological Area, which provides habitat for the Green and Golden Bell Frog and serves as a buffer between operations on the site and residences to the south;
- Off-site works comprising a road bridge over the existing New Enfield Marshalling Yard;
- Tarp shed; and
- Locomotive workshop known as the Wheel Lathe.

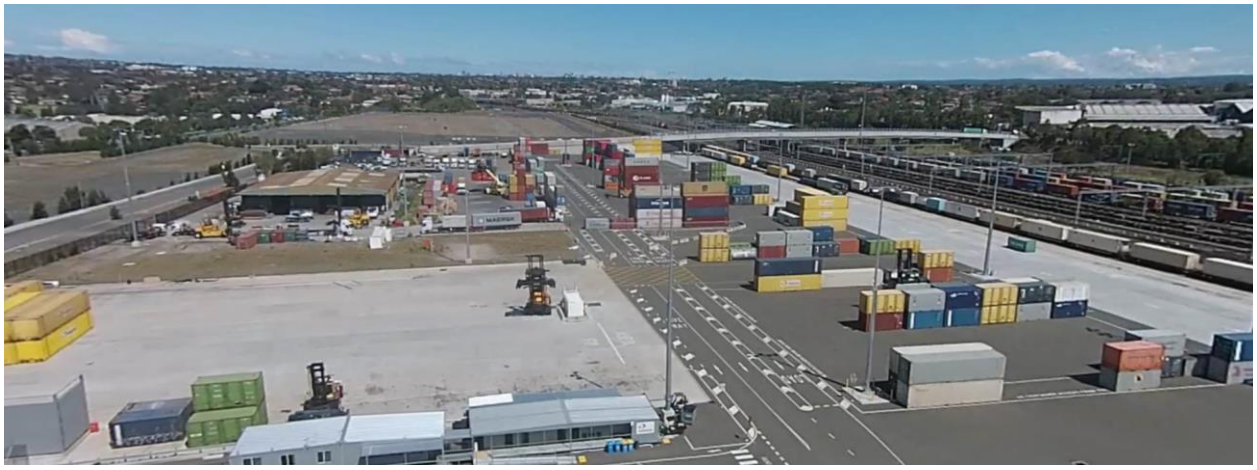
Picture 1 – Enfield ILC, aerial view looking north

*Source: NSW Ports*



Picture 2 – Enfield ILC, aerial view looking north

*Source: NSW Ports*



Picture 3 – Enfield ILC, aerial view looking south

*Source: NSW Ports*

# 2. PROJECT APPLICATION APPROVAL MP05_0147

## 2.1. PART 3A APPROVAL MP05_0147

A project application under Part 3A of the EP&A Act for the construction and operation of the Enfield ILC was submitted to the then Department of Planning in December 2005. The proposal involved the following key elements:

- *demolition, relocation or removal of former railway buildings and structures;*
- *earthworks and drainage including the levelling of the site, formation of landscape mounds and detention basins and removal of unsuitable materials, as required;*
- *construction and operation of:*
  - *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 TEU per annum;*
  - *rail sidings, railway lines and associated works to connect to the existing freight line;*
  - *warehousing for the packing and unpacking of containers and the short-term storage of cargo;*
  - *empty container storage facilities, for the storage of empty containers to be later packed or transferred back to the port by rail;*
  - *light industrial/commercial area fronting Cosgrove Road complementary to operations at the site;*
  - *access works including the construction of a road bridge over the new marshalling yards for access to Wentworth Street and an upgrade of the entrance to the site from Cosgrove Road; and*
  - *internal roads, administration buildings, diesel and LPG storage and fuelling facilities, container wash down area, vehicle maintenance shed, and installation of site services (all utilities, stormwater and sewerage).*

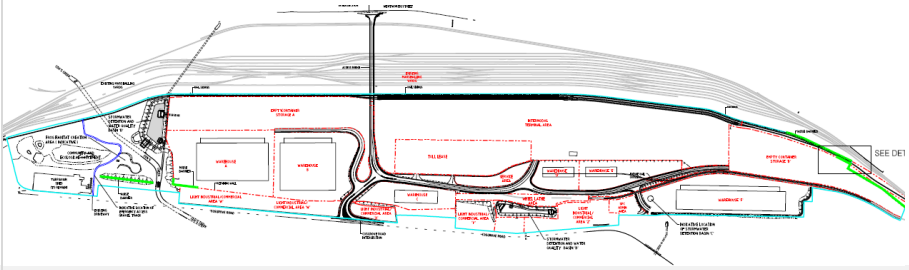
On 5 September 2007, the then Minister for Planning granted approval of the project under Section 75J of the Act (MP05_0147).

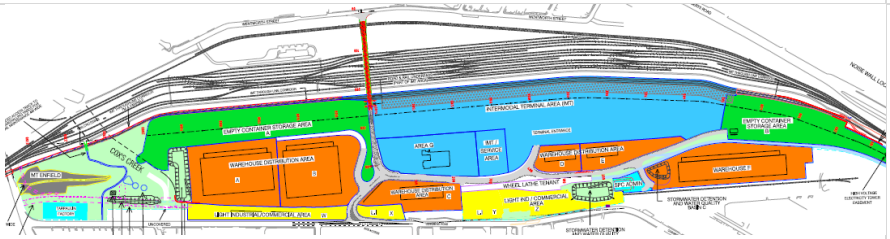
## 2.2. SECTION 75W MODIFICATIONS TO MP05_0147

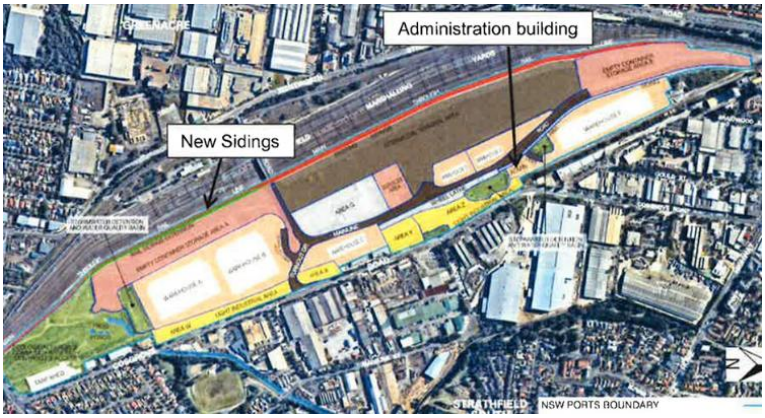
The Approval has been modified on eight occasions and a further modification (MOD 10) is currently under assessment. These modifications are summarised in Table 1 below:

Table 1 – Schedule of modifications to MP05_0147

| Approval No. | Modifications | Approval |
|---|---|---|
| MP05_0147 MOD1 | Amend condition 3.2 relating to construction dust monitoring | 07.10.08 |
| MP05_0147 MOD2 | Amendment to conditions 1.1, 1.2, 1.3A, and 2.43 to enable staged construction and operation and modified timing of submission of Site Audit Statements. | 30.03.09 |
| MP05_0147 MOD3 | Replace approved warehouse with a car load/unload facility. | Withdrawn |
| MP05_0147 | Update to conditions relating to: | 27.05.10 |

| Approval No. | Modifications | Approval |
|---|---|---|
| MOD4 | • noise walls,<br>• internal roads,<br>• stormwater detention, and<br>• development areas and site layout.<br>  | |
| MP05_0147<br>MOD5 | Relocation and reuse of unsuitable material to the southern part of the site known as Mount Enfield. While previous approval enabled movement of 37,000m3 of material, MOD 5 sought 60,000m3. This approval removes approximately 8K truck movements from the road and provides additional fill material raising Mt Enfield, improving visual amenity. | 10.11.11 |
| MP05_0147<br>MOD6 | Inclusion of the former Toll Lease Area within the project site, adjustments to site layout, subdivision and changes to meteorological monitoring.<br>• The former Toll site (area G) proposed for use either as part of the Intermodal Terminal Area or as Warehousing.<br>• Site layout adjustments include:<br>- Changes in the layout of the Light Industrial Commercial (LIC) Area and buildings, including an approximate 5% increase in the maximum gross floor area and a reduction of the setback distance of LIC area W from 10m to 8m<br>- Relocation of Stormwater Detention Basins B and D to allow a more efficient use of the existing site topography conditions and reduce cut and fill requirements during construction.<br>- Adjustments in the layout of the Service Area, Intermodal Terminal and Empty containers Storage Area A<br>- Adjustments to the layout of the noise walls to take into account the precinct layout changes and operational conditions.<br>• Amendment to subdivision layout<br>• Changes to Condition 2.4(b) and 2.20, 3.1 to provide flexibility with the requirement to close off the median strip on the Hume Highway at Como Road, Greenacre, and in the use of the project's meteorological station. | 12.12.12 |

| Approval No. | Modifications | Approval |
|---|---|---|
| |  | |
| MP05_0147<br><br>MOD7 | Modify the subdivision of the ILC site. | Withdrawn |
| MP05_0147<br><br>MOD8 | Amendment of the subdivision layout into 23 allotments to facilitate commercial leasing as shown.<br><br>  <br> | 27.11.13 |
| MP05_0147<br><br>MOD9 | Application for the proposed use of Site F to accommodate the Aglink Global development is for an intermodal agricultural and forestry commodities storage and handling facility. The operation of this use includes:<br><br>• Grain pits for the unloading of grain<br>• Two garner bins at approximately 50 metric tonne (mt) each<br>• Duel container loading areas<br>• Transfer elevator tower with transfer drag at a maximum height of 26 metres<br>• A total of 22 grain silos as, with a total footprint for silos will be approximately 6,300sqm (based on 105m x 60m)<br>• A small warehouse of approximately 5,525sqm (based on dimensions of 85m L x 65m W x 18m H)<br>• Two storey demountable ancillary office space<br>• Twelve parking spaces for employees<br>• Rail spur and rail hopper will be constructed on Site F from the existing rail line to the north of the site within Enfield ILC. This will be subject to future feasibility and demand. | SEARS issued |

| Approval No. | Modifications | Approval |
|---|---|---|
| MP05_0147<br><br>MOD10 | Amendment to freight-related operational activities within the intermodal terminal. Seeks to add additional freight-related operational activities within the intermodal terminal area including the empty container storage areas (Areas A and B on Lots 12 and 13).<br><br>To facilitate rail throughput, the modification also proposes to allow for rail to rail container handling with containers being handled, stored, packed / unpacked within the intermodal terminal area for transportation to Port Botany or other areas (regional and interstate). | Under Assessment |
| MP05_0147<br><br>MOD11 | Establish an additional warehouse (Warehouse G) in the southern portion of Area G (Lot 23). The warehouse footprint would fall partially within the area known as the former 'Toll Lease Area' site. Key aspects of the proposal include:<br><br>• construction of a warehouse including a workshop, wash bay, office, and ancillary staff amenities with a building footprint of approximately 3,300 sqm;<br><br>• minor excavation work undertaken for the installation of services and footings;<br><br>• provision of a staff parking area; and<br><br>• a new crossover from Mainline Road to separate light vehicle and existing heavy vehicle movements accessing the area; and<br><br>• associated removal of two trees and additional landscaping. | 08.02.17 |
| MP05_0147<br><br>MOD12 | Approval to extend two existing rail sidings and an existing office building.<br><br>The modification seeks to improve the operation of the terminal by enabling trains to access the site while the main through rail line is in use. It would also provide a wagon storage area for pre-loaded and out of service rail wagons. The extension to the existing office building is required to provide suitable facilities for current and future operational staff in a centralised building.<br><br>  <br> | 07.03.17 |

| Approval No. | Modifications | Approval |
|---|---|---|
| MP05_0147<br><br>MOD 13 | Application for the excise of the Tarpaulin Shed land from the Enfield ILC Part 3A Approval. | Under Assessment |

# 3. THE PROPOSAL

## 3.1. PROJECT NEED & OBJECTIVES

The Enfield ILC is currently operating well below its approved throughput capacity of 300,000 TEU per annum, with annual throughput estimated to be 50,000 TEU per annum. The graph at Figure 1 overleaf reflects changes in throughput for the year-to-date. The data indicates a general trend toward export movements, however, average throughput has remained well below the approved maximum with limited sustained growth.

Most of these TEU movements, approximately 40,000 TEU, relate to regional or interstate TEU movements with approximately 10,000 TEU movements via Port Botany. This represents an obstacle to the Enfield ILC's ability to attain a scale at which it can viably service Greater Sydney's 24/7 port supply chain.

Transport of containers to and from the site by truck is required to utilise surplus hardstand capacity, assist the growth of container volumes to make rail viable and, ultimately, ensure rail freight volumes grow to be the predominant transport mode between the port and the IMT.

The additional truck to truck transport activities will be more prevalent in the earlier years of operation when container freight volumes are relatively low and rail transport is in the start-up phase. As rail transport grows, the truck to truck transport activities will reduce. However, road-only transport is anticipated to continue as a minor transport mode at the Enfield ILC to facilitate the continued growth of container volumes, provide operational flexibility and ensure the commercial viability of the IMT.

Proposed truck to truck transport provides operational flexibility for container freight not suited to rail including time sensitive freight, refrigerated freight, oversized freight and freight that is distributed to or received from a spread of locations. Furthermore, there will be times when:

- rail path windows are not available from the intermodal terminal to allow trains to deliver containers to Port Botany to meet vessel departure times; or
- road transport is required to supplement the movement by rail of empty shipping containers back to Port Botany for export; or

Where MOD 10 encompassed the intermodal terminal and empty container storage areas, this MOD 14 applies to the warehouse sites within the Enfield ILC situated around the intermodal terminal. Market sounding of potential warehouse and distribution centre tenants has been undertaken in parallel with the MOD 10 application and ongoing assessment.

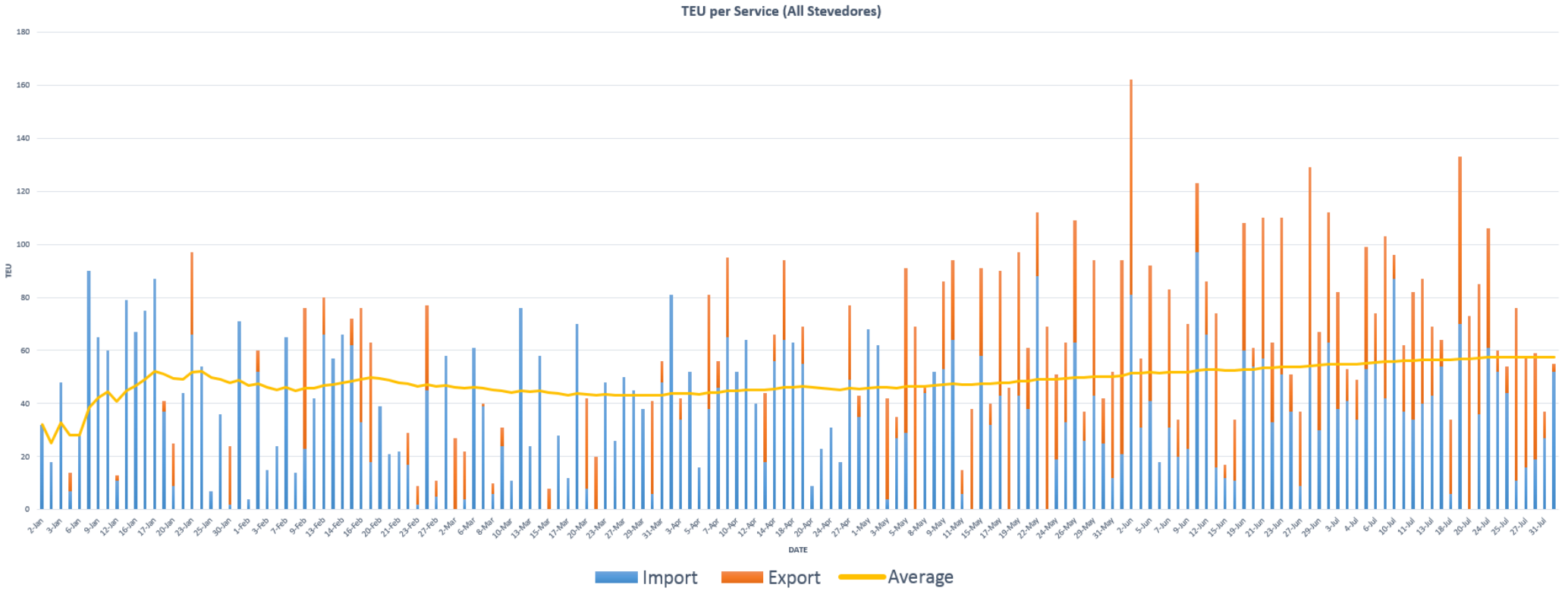
NSW Ports and the Proponent have engaged with a number of potential customers for Enfield ILC – including transport operators, freight forwarders who have a requirement for rail, and small-scale users that have a requirement for the smaller sites. Market analysis suggests that operational and built form restrictions imposed by the Approval are discouraging importers from considering the Enfield ILC a viable alternative to their current freight transportation arrangements.

The objectives of this proposal are to redress this situation and can be briefly summarised as follows:

- Introduce greater operational flexibility within the Enfield ILC by:
  - extending 24/7 operational hours; and
  - removing the restriction on rail-to-rail and truck-to-truck transfers on smaller sites

  to better service the needs and expectations of importers in the short term;
- Encourage a modal switch toward intermodal freight transportation in the medium to long term to service Greater Sydney's 24/7 port supply chain and alleviate road congestion.
- Implement a masterplan that provides the built form and site layout requirements of prospective commercial tenants and operators.

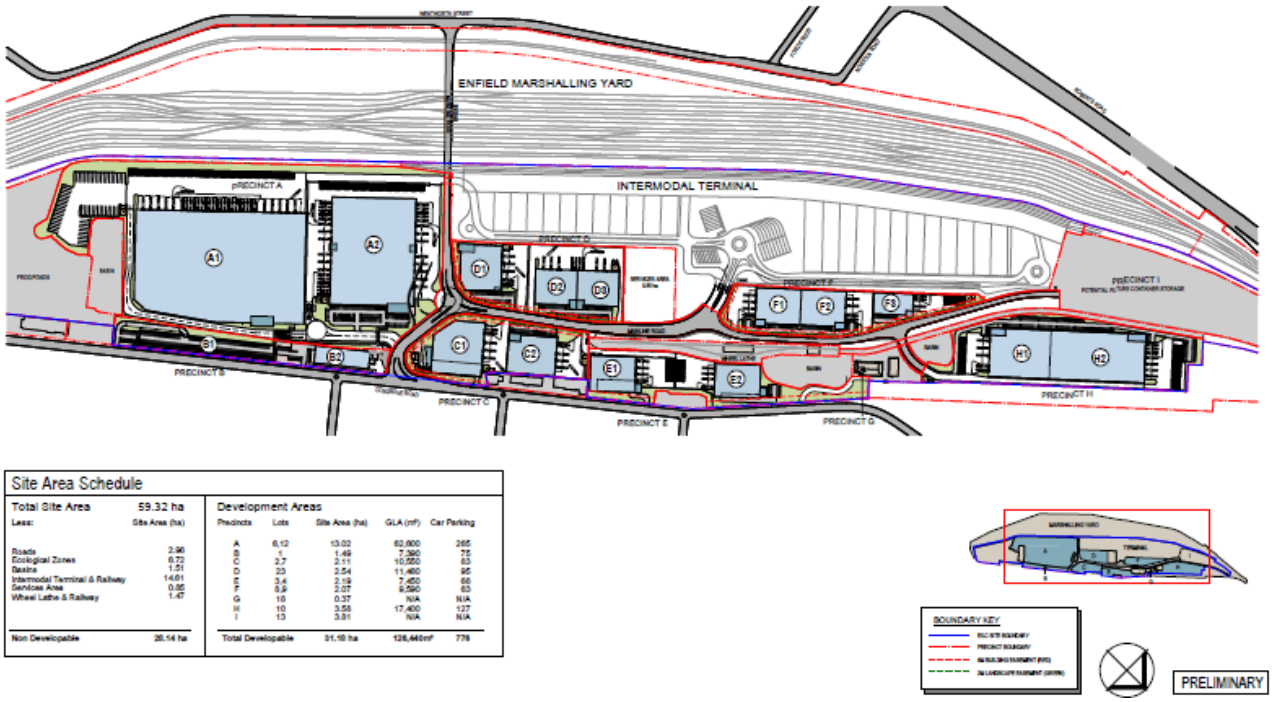
Figure 1 – Enfield Intermodal Logistics Centre Throughput, TEU Per Service 2017




*Source: NSW Ports*

## 3.2. MODIFICATION TO BUILT FORM PARAMETERS

The proposal seeks to modify the Approval in accordance with the concept masterplan prepared by land owner, NSW Ports, in collaboration with the Proponent. An extract of the concept masterplan proposal is provided at Picture 4 below (see also Appendix A). This will entail modifications to approved built form parameters as summarised in Table 2 below.




Picture 4 – Concept masterplan

*Source: NSW Ports & Goodman Property Services*

Table 2 – Summary of Proposed Precincts

| PRECINT | CURRENT LOT/S | SITE AREA | BUILDING AREA | BUILDING HEIGHT |
|---|---|---|---|---|
| Precinct A | 6 & 12 | 130,249 sqm | 62,600 sqm | 13.7 metres across all precincts |
| Precinct B | 1 | 14,979 sqm | 7,390 sqm | |
| Precinct C | 2 & 7 | 21,170 sqm | 10,550 sqm | |
| Precinct D | 23 | 25,469 sqm | 11,460 sqm | |
| Precinct E | 3 & 4 | 18,613 sqm | 7,450 sqm | |
| Precinct F | 8 & 9 | 20,759 sqm | 9,590 sqm | |
| Precinct G | 18 | 3,741 sqm | - | |

| PRECINT | CURRENT LOT/S | SITE AREA | BUILDING AREA | BUILDING HEIGHT |
|---|---|---|---|---|
| Precinct H | 10 | 35,783 sqm | 17,400 sqm | |
| Precinct I | 13 | 38,116 sqm | - | |

It is noted that the nine (9) Precincts proposed under the masterplan do not correlate with the precincts described by the Approval and conditions. The proposal will result in an increase in building area from seven warehouses with a total footprint area of 109,300 sqm under the Approval to 126,400 sqm under the new masterplan (indicative only).

## 3.3. MODIFICATION TO OPERATIONAL PARAMETERS

Limited changes to operational parameters specified under the Approval are also proposed to provide greater flexibility and enable the Enfield ILC to service Greater Sydney's 24/7 port supply chain. The proposed changes are as follows and clearly summarised within Table 3:

- Extend 24/7 operating hours;
- Permit *warehouse and distribution* uses; and
- Allow truck-to-truck freight movements for smaller sites with no direct interface with rail sidings.

Table 3 – Summary of Proposed Precincts

| PRECINCT | LOT | NEW USE | RAIL / TRUCK TO TRUCK | HOURS OF OPERATION | COMMENTS |
|---|---|---|---|---|---|
| Precinct A | 6 & 12 | Warehouse & distribution | - | - | Lot 12 to change from an empty container area to warehouse and distribution (including container storage and handling areas) |
| Precinct B | 1 | - | - | - | No change |
| Precinct C | 2 & 7 | Warehouse & distribution | Permit truck to truck for Lot 7.<br>NB: Lot 2 already approved for truck to truck. | Change Lot 2 to 24/7 use to be in line with Lot 7. | Building to straddle Lots 2 and 7. Hence, the need for the mode of transport approval. |
| Precinct D | 23 | - | - | - | No change |
| Precinct E | 3 & 4 | Warehouse & distribution | - | Change to 24/7 | Warehouse and distribution use and 24/7 |
| Precinct F | 8 & 9 | Warehouse & distribution | Permit truck to truck | - | Truck to truck ability |
| Precinct G | 18 | - | - | - | No changes |

| PRECINCT | LOT | NEW USE | RAIL / TRUCK TO TRUCK | HOURS OF OPERATION | COMMENTS |
|---|---|---|---|---|---|
| Precinct H | 10 | Warehouse & distribution | Permit truck to truck | - | Truck to truck ability |
| Precinct I | 13 | - | - | - | No change |

# 4. PLANNING ASSESSMENT FRAMEKWORK

The environmental planning instruments and policies relevant to the proposal and the site are addressed in the subsections that follow.

## 4.1. STRATEGIC PLANNING POLICY

### 4.1.1. NSW Premier's and State Priorities

The NSW Premier's and State Priorities establish key priorities of the NSW Government intended to grow the economy, deliver infrastructure, protect the vulnerable, and improve health, education and public services across NSW.

The 12 Premier's Priorities are wide-ranging in theme and generally not of relevance to the proposal. However, we note the proposal will make a modest contribution in terms of job creation. The proposed modifications are anticipated to generate an estimated 800 FTE jobs during its operational phase, noting the final number of FTE jobs will ultimately be determined by future intermodal operators and tenants once these have been secured. Further, the proposed modifications are consistent with the spirit of the priority to efficiently deliver of key metropolitan infrastructure projects.

Similarly, the 18 State Priorities are of limited relevance to the subject site and proposal with the exception of the priority of improving road travel reliability, which seeks to ensure 90% of peak travel on key road routes is on time.

Both the NSW Premier's and State Priorities note avoidable congestion costs NSW more than $5 billion a year and will grow to $8 billion by 2020 if ignored. Smart, connected and resilient infrastructure is needed across NSW.

### 4.1.2. A Plan for Growing Sydney 2014

A Plan for Growing Sydney, released in December 2014, is the NSW Government's currently in force plan for the Sydney Metropolitan Area over the 20 years to 2034. The Plan provides key directions and actions to guide Sydney's productivity and environmental management under the following broad goals:

- Goal 1: A competitive economy with world-class services and transport
- Goal 2: A city of housing choice, with homes that meet our needs and lifestyles
- Goal 3: A great place to live with communities that are strong, healthy and well connected
- Goal 4: A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.

The subject land, and freight transportation more generally, form explicit considerations of *A Plan for Growing Sydney* as detailed in the following Directions, Actions and Priorities:

- Direction 1.5 Enhance Capacity at Sydney's Gateways and Freight Networks
  - Action 1.5.1 - Develop and implement a strategy for the Sydney Airport and Port Botany precincts to support their operation, taking into account land uses and the proposed road transport investments.
  - Action 1.5.1 - Support the productivity of the freight network by identifying buffers around key locations on the freight network
- Direction 1.8: Enhance linkages to Regional NSW
  - Action 1.8.1: Improve productivity and access to services through improved transport links to regional NSW
- Priorities for Central Subregion
  - A competitive economy - Plan for adjoining land uses and freight connections at Enfield Intermodal Logistics Centre, based on continued longterm operation.

- Priorities for Transport Gateways
  - Port Botany Precinct • Protect Port Botany's function as an international gateway for freight and support port-related land uses and infrastructure in the area around the port.
  - Support the land use needs of freight movement to increase the proportion of container freight transported by rail.

### 4.1.3. Towards Our Greater Sydney 2056

Released in November 2016, Towards our Greater Sydney 2056 (ToGS 2056) is a future plan for a growing Greater Sydney and draft amendment to the A Plan for Growing Sydney. ToGS 2056 acknowledges the contradiction in the location of the majority of Greater Sydney's jobs in the east while an increasing number of people are living in the west. This has created capacity constraints such as higher levels of congestion, lower rates of housing affordability and uneven access to employment choices.

Capitalising on investment in the Western Sydney Airport and economic activity around Western Sydney that this will generate, ToGS 2056 proposes a major shift in strategic planning for Greater Sydney which focuses on the regional significance of central and western Sydney. ToGS introduces the strategy for a metropolis of three cities: the Eastern City, the Central City, and the Western City.

The Eastern City, which includes the land subject of this EA, is described as follows:

- *The established Eastern City is the currently established Sydney City and economic corridors to its north through to Macquarie Park and south through Sydney Airport and Port Botany to Kogarah.*
- *It is an economic engine – especially in the financial, business and professional services and innovation start-up sectors – with a beautiful harbour, sought-after suburbs and a large proportion of knowledge intensive jobs.*
- *There are many opportunities to enhance the Eastern City, such as the renewal of government-owned land near Sydney City and tackling congestion. Our planning must support and enable the continued growth of the Eastern City's global industries and branding.*
- *The established city contains significant heritage precincts such as The Rocks, Millers Point, Macquarie Street and the Royal Botanic Gardens and the Domain. The Harbour foreshores include significant evidence of Aboriginal occupation and interaction with the landscape.*

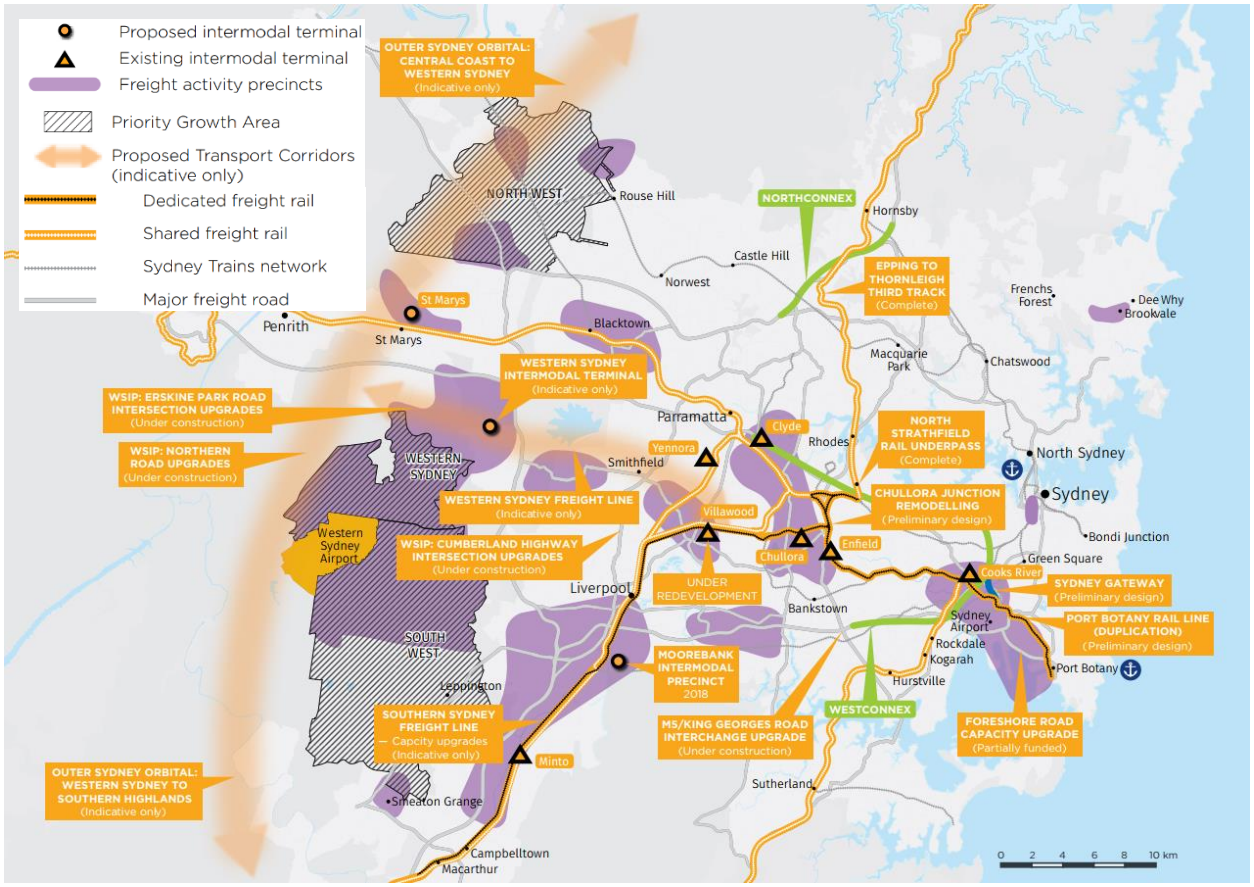
The strategic aims of ToGS 2056 are broad in nature and not of direct relevance to the current proposal. It is noted, however, that no aspect of the proposal will preclude the future achievement of these aims.

### 4.1.4. Draft Central District Plan 2016

The Greater Sydney Commission's draft Central District Plan was placed on public exhibition from November 2016 to the end of March 2017. The draft Plan sets out priorities and actions for Greater Sydney's Central District, which includes the City of Sydney and the subject land. This draft Plan is anticipated to be finalised towards the end of 2017.

The Central District is identified as the focus of the NSW freight network and connects the nation's most heavily utilised road and rail network. The Enfield Intermodal Logistics Centre is identified as an important concentration of freight activity with South Strathfield-Enfield named a major employment and urban services precinct (see Figure 1 overleaf).

This freight network is identified as a critical factor in the realisation of Metropolitan Sydney's as 'A Productive City'. Of relevance is Section 3.8 Managing Sydney's Trade Gateways, which addresses the changing nature of the freight task and the need to improving the efficiency of the freight network.




Picture 5 – Greater Sydney's freight network, Draft Central District Plan

*Source: Greater Sydney Commission*

## 4.1.5. NSW Long Term Transport Master Plan

The NSW Long Term Transport Masterplan coordinates land use planning with transport planning including integration of freight and passenger movement. One of twelve identified action areas is given as follows:

> *Improving freight efficiency and productivity through major investments and efficiencies in the road and rail freight networks and at ports, airports and intermodal terminals, and through the Bridges for the Bush program to improve regional connectivity.*

## 4.1.6. NSW Freight and Ports Strategy 2013

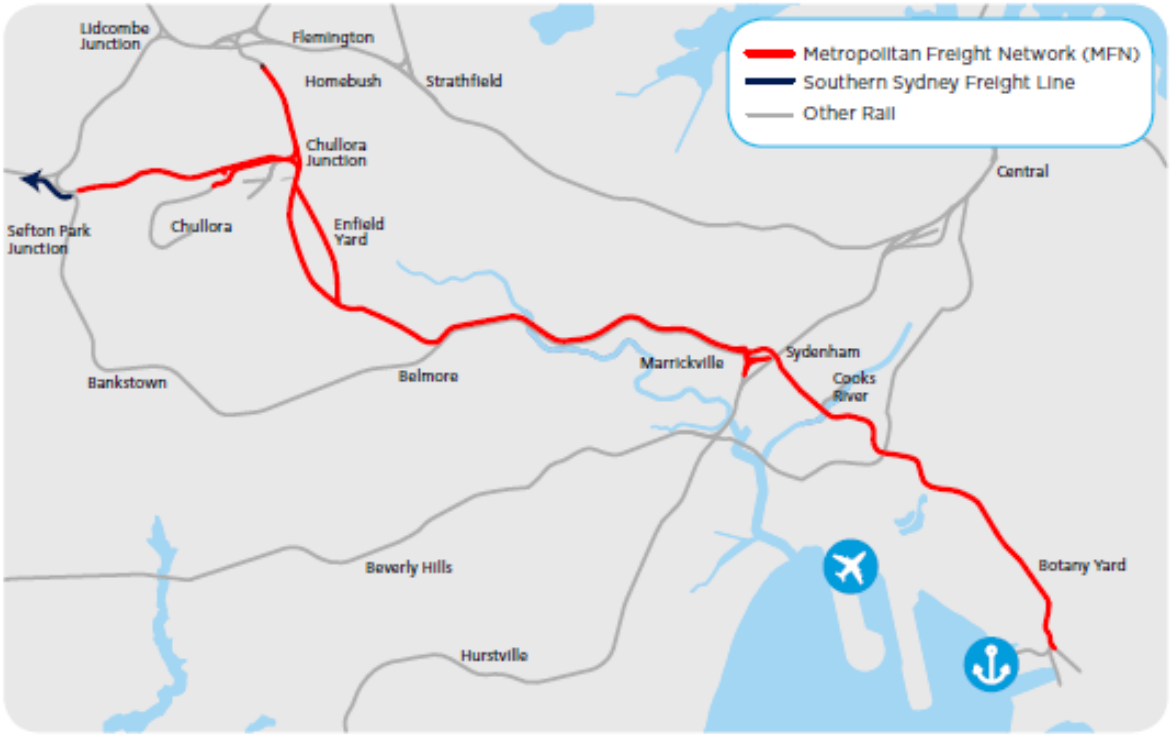
The Freight and Ports Strategy 2013 aims to ensure freight is at the forefront of the NSW economy with a doubling of freight volumes through NSW to nearly 800 million tonnes by 2031. The main strategies to achieve this are given as:

- *A strategic focus to ensure policy; infrastructure and land-planning initiatives deliver a freight network where capacity and performance can meet demand.*
- *An efficient and effective freight network which is the cornerstone of economic productivity and growth.*
- *Investing heavily in new infrastructure to deliver greater capacity across the transport network.*

The Freight and Ports Strategy 2013 identifies that an ongoing lack of forward planning in metropolitan and regional NSW is anticipated to result in further under provision of intermodal terminals and result in new intermodal developments which do not maximise on the existing and planned improvements to road and rail networks.

In the Sydney metropolitan area, the Enfield ILC is identified as addressing some of these planning issues assisted by its connection to a dedicated rail freight line and proximity to an established industrial area with links to Metroad 3 and the Hume Highway (see Figure 4). A similar model is proposed for the proposed intermodal terminals at Moorebank, which are close to the Southern Sydney Freight Line and the M5, Hume Highway and M7.

Figure 2 – Key Freight Destinations (NSW Freight and Ports Strategy 2013)




The Freight and Ports Strategy 2013 identifies that 85% of import and export containers originate or are destined for locations within 40km of Port Botany. Approximately 14% of freight movements occur by rail, with road remaining the predominant transport mode. The proposed development will mode share increasing the rail efficiency by providing both inbound and outbound freight by rail as well as road. It will allow an expanded use of the rail network, serving both metropolitan and regional freight lines rather than being restricted to the Port rail shuttle only. This also has the potential to reduce the long-term environmental impacts associated with truck movements.

The Freight and Ports Strategy 2013 also identifies that successful intermodal terminals across the State include value-add services, either within the terminal or nearby including freight consolidation and de-consolidation, warehousing and cross dock operations and container storage.

The Enfield ILC combines a number of opportunities for these value-add services with the site including container storage, intermodal terminal area, light industrial / commercial area and warehousing.

### 4.1.7. NSW Ports' 30 Year Master Plan

NSW Ports' 30 Year Master Plan, 'Navigating the Future', presents NSW Ports' view on the actions required to ensure the long-term sustainability of NSW's port supply chain. The Master Plan details expected trade growth over the next 30 years and outlines actions needed to service this growth. Five objectives to sustainably cater for forecast trade growth are identified.

Key strengths of the Enfield ILC are noted, as follows:

- Provide efficient road connections to the ports and intermodal terminals
- Grow rail transport of containers
- Use land and infrastructure efficiently
- Grow port capacity

- Protect the ports and intermodal terminals from urban encroachment

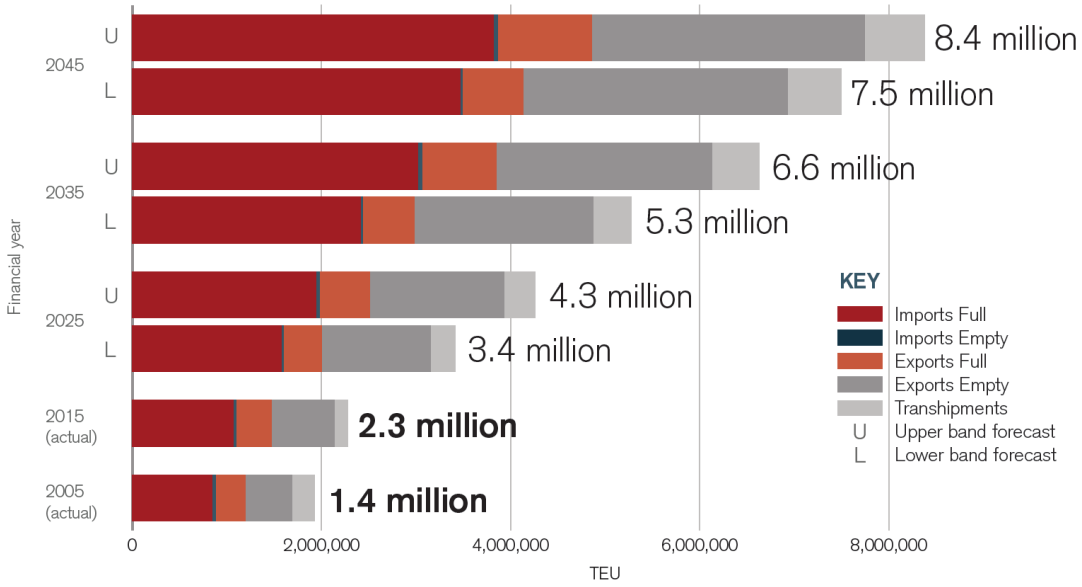
As a critical intermodal asset, the Enfield ILC is a focus of the masterplan, which predicts the Enfield ILC will remove more than 370 container trucks every day from the roads around Port Botany. The achievement of this reduction, however, is reliant upon the Enfield ILC meeting the needs of transport operators and achieving its approved capacity of 300,000 TEU per annum.

The primary form of trade through Port Botany is containers. Port Botany is expected to become Australia's largest container port by volume in the next 30 years. Containers are forecast to grow from 2.3 million TEU now to between 7.5 million and 8.4 million TEU per year by 2045 (see Figure 2 below).

NSW Ports is committed to the gradual increase in mode share of rail in the transportation of freight throughout NSW. Truck to truck transport activities at the Enfield ILC will be more prevalent in the earlier years of operation as container freight volumes remain relatively low and rail transport is in the start-up phase. As the IMT grows to achieve the container volumes required to make rail viable, rail freight volumes will grow to be the predominant transport mode between the port and the intermodal terminal.

A key objective of MOD 14 is to encourage uptake of spare capacity across smaller sites comprising approximately 40% of the Enfield ILC to facilitate the continued growth of container volumes, provide operational flexibility and ensure the commercial viability of the intermodal terminal.

Figure 3 – NSW Ports' 30 Year Master Plan




Picture 6 – Port Botany Container Forecast to 2046

*Source: NSW Ports*

# 4.2. STATUTORY PLANNING CONTEXT

## 4.2.1. Environmental Planning and Assessment Act 1979

MP05_0147 was approved under Part 3A of the Act. In 2011 the NSW Government repealed Part 3A of the EP&A Act and announced that new projects would no longer be accepted in the Part 3A assessment system.

Pursuant to Schedule 6A of the amended EP&A Act, the approved project is defined as a '*transitional Part 3A project*' and therefore Part 3A of the EP&A Act continues to apply in respect of the project. Section 75W (2) of the EP&A Act provides that a Proponent can request the Minister to modify the approval of a project as follows:

> ***75W Modification of Minister's approval***
>
> *(1) In this section:*

*Minister's approval means an approval to carry out a project under this Part, and includes an approval of a concept plan.*

*Modification of approval means changing the terms of a Minister's approval, including:*

*(a) revoking or varying a condition of the approval or imposing an additional condition of the approval, and*

*(b) changing the terms of any determination made by the Minister under Division 3 in connection with the approval.*

*(2) The proponent may request the Minister to modify the Minister's approval for a project. The Minister's approval for a modification is not required if the project as modified will be consistent with the existing approval under this Part.*

*(Our emphasis)*

The Land and Environment Court case *Barrick Australia Ltd v Williams* clarified that the Minister for Planning's power to modify a Part 3A approval under Section 75W can be used for changes that have *'limited environmental consequences'* beyond those approved in the original project assessment.

The EA will demonstrate the proposed modifications will have limited environmental consequences beyond those approved under MP05_0147 and, therefore, constitute a modification of the Major Project approval in accordance with Section 75W of the EP&A Act

### 4.2.2. State Environmental Planning Policy No 33 – Hazardous & Offensive Development

State Environmental Planning Policy No 33—Hazardous and Offensive Development (SEPP 33) seeks to ensure that the relevant authority has sufficient information to assess whether the development is hazardous or offensive and, if the development is found to be potentially hazardous or offensive, to impose conditions to reduce or minimise any adverse impact.

We note Condition 1.7 of the Approval does not allow dangerous goods to be packed, repacked, or decanted without a further risk assessments being undertaken and approved by the Secretary. No modification of this condition is sought.

Further assessment against SEPP 33 is not required in this instance.

### 4.2.3. State Environmental Planning Policy No 55 – Remediation of Land

State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) provides for a State-wide planning approach to the remediation of contaminated land. A determining authority must consider whether the land subject of a proposal is contaminated and, if the land is contaminated, be satisfied that the land is suitable in its contaminated state for the use proposed. If the land requires remediation to be made suitable for the proposed purpose, the determining authority must be further satisfied that the land will be so remediated before the land is used for that purpose.

The suitability of the Enfield ILC site for use as an intermodal freight facility was assessed under MP05_0417. However, the proposed modifications entail the approval of new land uses within the Enfield ILC including storage units, small retail tenancies, and cafes. Further assessment of the suitability of the Enfield ILC for these additional uses is required.

### 4.2.4. State Environmental Planning Policy (State and Regional Development) 2011

Schedule 3 to *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) identifies development for the purpose of rail and related facilities of a certain capital investment value (CIV) as State Significant Development (SSD), as follows:

*19 Rail and related transport facilities*

*(1) Development that has a capital investment value of more than $30 million for any of the following purposes:*

*(a) heavy railway lines associated with mining, extractive industries or other industry,*

*(b) railway freight terminals, sidings and inter-modal facilities.*

*(2) Development within a rail corridor or associated with railway infrastructure that has a capital investment value of more than $30 million for any of the following purposes:*

*(a) commercial premises or residential accommodation,*

*(b) container packing, storage or examination facilities,*

*(c) public transport interchanges.*

Although the proposal relates to transport facilities, it has a genuine estimated CIV well below the $30 million threshold. The subject proposal, therefore, is not state significant. The project is, in any case, a transitional Part 3A project.

Further consideration of the SRD SEPP is not required.

## 4.2.5. State Environmental Planning Policy (Infrastructure) 2007

The provisions of *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) have been considered in the preparation of this request. As the proposal is for a rail infrastructure facility, it does not trigger requirements for sensitive uses such as residential, public worship etc. under Clauses 86 and 87.

Schedule 3 of the SEPP specifies development that qualifies as traffic generating development that must be referred to the Roads and Maritime Services (RMS) and applies to the enlargement or extension of existing an existing freight intermodal facilities.

Although an increase in TEU throughput it not proposed, modifications to approved operational parameters to allow rail-to-rail and truck-to-truck transfers arguably constitutes an extension of the Enfield ILC. The RMS, therefore, is required to be notified of the works on this basis.

## 4.2.6. Strathfield Local Environmental Plan 2003

The site lies within the Strathfield Local Government Area and is subject to the *Strathfield Local Environmental Plan 2011* (SLEP 2011). The relevant clauses of SLEP 2011 are addressed in the subsections that follow.

### 4.2.6.1. Part 2 Permitted or Prohibited Development

Under Part 2 Permitted or Prohibited Development of SLEP 2011, the land is generally zoned IN1General Industrial. There is an area of approximately 2.56 Ha zoned RE2 Private Recreation within the southern portion of the site, which generally follows the alignment of Cox Creek. Development for a 'freight transport facilities' is permitted with consent in the IN1 zone but not the RE2 zone.

### 4.2.6.2. Part 4 Principal development standards

There is no minimum subdivision lot size applicable to the site. Clause 4.3 establishes a maximum building height of 12 metres for the site. Clause 4.4 establishes a maximum floor space ratio of 1:1 for the site.

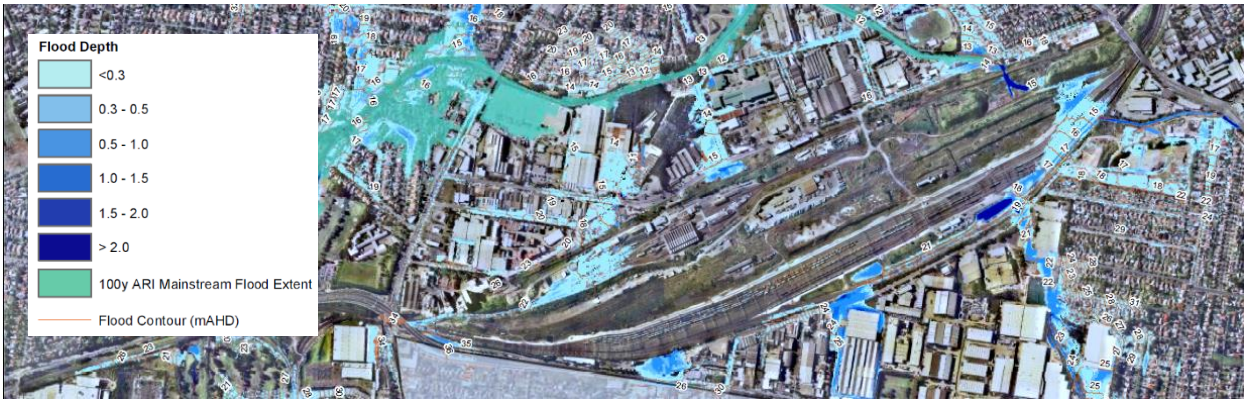
### 4.2.6.3. Part 5 Miscellaneous provisions

A review of Part 5 of the SLEP 2011 did not identify any provisions of direct relevance to the proposed modifications. It is noted that Clause 5.12 clarifies that the SLEP 2012 does not restrict, prohibit, or enable the restriction or prohibition of, the carrying out of any development by a public authority that is permitted to be carried out without development consent under the ISEPP.

### 4.2.6.4. Part 6 Additional Local Provisions

Clause 6.1 Acid Sulfate Soils seeks to ensure that development does not disturb, expose or drain acid sulfate soils and cause environmental damage. The Enfield ILC site is identified as Class 5 lands, the lowest risk category. Development consent is required for works within 500 metres of adjacent Class 1, 2, 3 or 4 land that is below 5 metres Australian Height Datum and by which the watertable is likely to be lowered below 1 metre Australian Height Datum on that adjacent land. The proposed works do not entail such works and further consideration of Clause 6.1 is not required in this case.

Clause 6.3 Flood planning seeks to minimise the flood risk to life, property, and the environment associated with the use of land subject to flood hazard. As demonstrated by the Cooks River & Coxs Creek Flood Study, the site lies in part below the 100 Year ARI flood planning level. The heads of consideration provided under Clause 6.3, therefore, are a relevant consideration for the EA.




Picture 7 – Cooks River & Coxs Creek Flood Study, Design Flood Contours & Depths, 100 Year ARI

*Source: Strathfield Council*

A review of SLEP 2012 revealed no other matters requiring consideration in this instance.

# 5. KEY ISSUES

Key issues arising from a review of the site context and concept masterplan are as follows:

- Freight Operational Issues
- Traffic & Transport
- Built form
- Visual Impact
- Acoustic Impact
- Lighting Strategy
- Ecological impact

The following subsections address the potential impacts of the proposed development and the likely measures to avoid, mitigate and/or manage these. This information has been prepared to assist the DPE in preparing the SEARs, particularly the detailed studies required to support the modification.

## 5.1. FREIGHT OPERATIONAL ISSUES

The EA will assess the impact of the proposed modifications on the Greater Sydney freight network now and into the future. This assessment will include detailed discussion of project justification, consideration of alternatives, and anticipated gains in terms of quantum and efficiency of freight movements on the rail network between Port Botany, Enfield, metropolitan Sydney and regional NSW.

TEU throughput at the Enfield ILC – approximately 50,000 TEU per annum – remains well below the approved maximum of 300,000 TEU per annum. Notwithstanding approval for seven warehouses with a total footprint area of 109,300 sqm, none has been developed on the site to date. Further, the Enfield ILC is generally finding it difficult to attract and retain transport operators and tenants for the site.

Market analysis indicates larger operators report the need for an emergency back-up service in case of disruption to the rail network. These matters are redressed by changes sought under MOD 10, which is currently under assessment by DPE.

Market analysis also indicates current operational parameters restricting operating hours, warehouse and distribution uses and truck-to-truck transportation are discouraging smaller operators from relocating to the Enfield ILC to utilise surplus capacity. This MOD 14 seeks to provide greater level of operational flexibility as well as built form outcomes that better suit the needs of these smaller operators.

The EA will provide a detailed assessment of potential impacts, including cumulative impacts noting operational changes sought by MOD 10.

## 5.2. TRAFFIC AND TRANSPORT

### 5.2.1. Access

Access to the Enfield ILC will be consistent with the Project Approval which allows for access to the site by Cosgrove Road and Wentworth Street. Although modifications to internal circulation are proposed, no amendment to the site access arrangements will be sought as part of the Section 75W application.

~~Noting capacity constraints along Cosgrove Road,~~ NSW Ports and the Proponent are committed to maintaining Wentworth Street as the main access point to the Enfield ILC, particularly for truck movements to and from Port Botany via the route of Mainline Road, Wentworth Street, Roberts Road, King Georges Road, and the M5.

### 5.2.2. Throughput Capacity and Traffic Generation

Condition 1.5 limits the Enfield ILC *t*o a maximum throughput of 300,000 TEU per annum, as measured at the rail to intermodal terminal interface.

No change to the maximum permissible throughput of 300,000 TEU per annum is proposed. However, modifications to permit rail-to-rail and truck-to-truck transfers are anticipated to generate a change in modal split for freight transfers at the Enfield ILC.

The Approval includes conditions governing on-site, local and regional traffic management. It is anticipated that traffic impacts arising as a result of the proposed modification can be managed via existing conditions of approval, which include measures to prevent movement of heavy vehicles through residential areas, intersection upgrades, monitoring, compliance, and preparation of an Operation Traffic Management Plan.

The EA will detail any anticipated change in modal split arising due to the modifications and propose new or amended conditions of approval, as needed. Potential impacts in terms of traffic generation, intersection performance and road maintenance in the context of surrounding sensitive land uses including residential areas will be assessed as part of the Section 75W application.

It is noted that intersection upgrades required by the conditions of approval are now completed.

### 5.2.3. Parking

The proposed modifications entail the addition of new floor area and the creation of an estimated 800 FTE jobs. Provision for parking demand generated by the Enfield ILC workforce will be accommodated on-site. It is noted that parking provision on the Enfield ILC, as approved, has historically been below RMS and Council rates. Parking provision under the proposed masterplan will bring on-site parking in line with the relevant RMS rates.

Design of parking areas within the EIL is currently governed by Condition 2.3. Changes to parking layout and design arising from the proposed modification can similarly be managed via existing conditions of approval.

A Traffic and access report will be prepared in support of the Section 75W application and will include an assessment of change in parking demand and adequacy of on-site parking provision.

## 5.3. BUILT FORM

The proposed building envelopes are consistent in typology and built form with the historic and likely future character of the Enfield ILC site within its industrial setting. The EA will assess the height, density, bulk and scale of the proposed masterplan within the context of surrounding built and natural environment. It will demonstrate how the proposal integrates with its context and how the built form and site layout achieves good urban design and amenity outcomes for users of the site, surrounding properties and the public domain.

Architectural Plans (including masterplan, precinct plans and massing studies) detailing the proposed modified building envelopes will be provided as part of the Section 75W application, including a concept landscape design to enhance the visual presentation of the site to the surrounding public domain along Cosgrove Road.

Built form within the Enfield ILC is currently governed by height and footprint parameters established under conditions 1.6 and 1.9. The s75W modification will seek to modify these in accordance with the concept masterplan. No change to the requirement to submit final design plans to the Secretary for approval before the commencement of construction works (Conditions 1.8 and 1.11 under the Approval) is proposed.

To facilitate the issue of the SEARs, a concept masterplan is attached at **Appendix A** and provides indicative site layout and building footprints.

## 5.4. VISUAL IMPACT

Given the site is situated within a prominent elevated location within the locality, the EA will assess potential visual impacts upon views from surrounding residential areas. The extent of separation between the site and surrounding residential uses generally limits potential visual amenity impacts for most residences.

Potential views of the site may occur along Blanche Street where the land falls south east toward existing dwellings. A visual assessment of the proposed built form will investigate potential impacts on these and other relevant sensitive uses and form part of the Section 75W application.

## 5.5. AIR QUALITY, ODOUR & DUST EMISSIONS

The Approval includes conditions relating to air quality impacts, odour and dust emissions. It is anticipated that air quality impacts arising as a result of the proposed modification can be managed via existing conditions of approval, which include environmental monitoring, auditing, and compliance measures.

Air quality impacts will be assessed as part of the Section 75W application to ensure that the proposed operations on the site will not impact on residential amenity or the amenity or surrounding land users in terms of emissions and dust control.

## 5.6. ACOUSTIC IMPACT

The Approval includes conditions relating to operational noise management and sets maximum noise criteria in accordance with the NSW Industrial Noise Policy. Again, it is anticipated that air quality impacts arising as a result of the proposed modification can be managed via existing conditions of approval, which include operational noise limits, noise monitoring, and the preparation of an Operational Noise Management Plan.

Acoustic impacts will be assessed as part of the Section 75W application to ensure that the proposed operations on the site will not impact on residential amenity or the amenity or surrounding land users taking into account the proposal to allow 24/7 operation.

## 5.7. LIGHTING STRATEGY

The Approval includes conditions that require all external lighting be mounted, screened, and directed in such a manner so as not to create a nuisance to surrounding land uses in general accordance with *AS 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting*. It is anticipated that light spill impacts arising due to the proposed modification can be managed via existing conditions of approval.

The proposed lighting of the site will be designed to allow for safe working conditions in all areas during night time operations. The s75W application will assess potential impact of light spill on nearby residences during operations of the Enfield ILC considering the proposal to allow 24/7 operation.

## 5.8. ECOLOGICAL IMPACT

The Flora and Fauna Report prepared in support of Project Application MP05_0147 concluded the following regarding potential ecological impacts arising from the Enfield ILC proposal:

> *The areas on which construction of the ILC site would impact directly are highly modified and in poor condition. During construction, the ILC site would involve the removal of only highly disturbed, weed infested or non-native/ornamental vegetation, which has little habitat value for all but the most disturbance tolerant species.*

Project Application MP05_0147 included the creation of an additional Green and Golden Bell Frog Habitat Area on the south-eastern portion of the site to minimise disturbance or habitat loss that might result from the development of the Enfield ILC (see Figure 3). No works are proposed within the habitat area and works proposed within its vicinity are consistent in nature with those already approved.

The Approval includes conditions that require the implementation of the Management Plan for the Green and Golden Bell Frog Key Population at Greenacre. Further, as noted no change to the requirement to submit final design plans to the Secretary for approval before the commencement of construction works (Conditions

1.8 and 1.11) is proposed. The proposed MOD 14 does not seek to change conditions relating to ecology and it is anticipated that management of potential impacts upon habitat area arising due to the proposed modification can be managed via these existing conditions of approval.

Figure 4 – Flora and Fauna Precincts and Frog Habitat Areas


## 5.9. CONTAMINATION

In recognition of the historic uses of the site and areas of environmental consent identified by Project Application MP05_0417, Condition 2.43 of the Approval requires a Site Audit Statement be prepared prior to the commencement of works as follows:

> *2.43 Prior to the commencement of construction works associated with the project that may disturb contaminated areas of the site, the Proponent shall submit to the Director-General a Site Audit Statement(s), prepared by an accredited Site Auditor under the Contaminated Land Management Act 1997, verifying that the area of the site on which construction is to be undertaken has been or can be remediated to a standard consistent with the intended land use. A final Site Audit Statement(s), prepared by an accredited Site Auditor, certifying that the contaminated areas have been remediated to a standard consistent with the intended land use is to be submitted to the Director-General prior to operation of the remediated site(s).*

It is noted that condition of approval 2.43 has been satisfied via remediation and certification processes. It is further noted that the suitability of the Enfield ILC for use as an intermodal facility as well as for warehouse and distribution centres has already been established via previous approvals. The proposed MOD 14 does not seek to change anything in relation to contamination under the existing Approval. All relevant management plans – construction and environmental will be adopted and adhered to.

Further consideration of contamination issues, therefore, is not required in this case.

# 6. EXPECTED DELIVERABLES

To assist in confirming the SEARS, we have conducted an examination of what the expected deliverables will be to accompany the EIS. These include:

- Land Owner's Consent
- Environmental Assessment
- Survey Plan
- Site master plan
- Massing study including perspectives
- Acoustic Assessment
- Traffic, Parking and Access Study

# 7. CONCLUSION

This submission has provided an outline of the proposal for the site and identified the key environmental issues to assist the DPE in the preparation of the SEARs.

Accordingly, SEARs are requested to guide the preparation of the Environmental Assessment and the relevant specialist supporting documentation.

We would welcome the opportunity to meet with DPE (and other key stakeholders, as required) to provide a detailed briefing regarding the project.

# DISCLAIMER

This report is dated 7 September 2017 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Goodman Property Services Pty Ltd (**Instructing Party**) for the purpose of obtaining the Secretary's Environmental Assessment Requirements (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

# APPENDIX A PROPOSED ENFIELD ILC MASTERPLAN


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