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Mr Nathan Heath
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Social and Other Infrastructure Assessments
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Dear Mr Heath

**St Marys Intermodal – Modification 1 –
Rail Siding Refurbishment Works Package (SSD 7308 Mod 1)
Advice on Modification**

I am writing to you in reply to your invitation to the Environment Protection Authority (EPA) to provide advice on the above modification request. The EPA understands that the modification includes: re-laying the two existing rail sidings within the existing footprint of the total length of the sidings up to Christie Street; upgrading the existing level crossing; construction of an access track adjacent to the rail sidings; and construction of stormwater infrastructure. The Rail refurbishment is also proposed to widen the curve gauge which could reduce wheel squeal.

The EPA has reviewed the following relevant modification documents.

- *Modification Proposal to SSD 7308 St Marys Intermodal (SSD 7308 Mod 1) Rail Refurbishment Works*, Final Version, dated 13 October 2020, prepared by Urbanco
- Update Noise and Vibration Impact Assessment – Non-network Rail, letter dated 24 June 2020, prepared by AECOM (updated NIA)
- *Supplementary Contamination Investigation – Railway Corridor Proposed St Marys Intermodal Freight Terminal*, prepared by Douglas Partners, dated 1 July 2020

The EPA provides the following advice and noise and vibration and contamination:

Noise and Vibration

1. Assessment of operational rail noise

It appears that in the updated NIA, the section of the rail siding which extends north of the area considered in the EIS has been assessed using the provisions from the *Rail Infrastructure Noise Guideline* (EPA, 2013) (RING) for non-network rail lines.

However, it appears that siding will be used for shunting, switching and storage of trains as part of the intermodal facility and does not lead to other industrial premises. As such the EPA considers that the siding sections north of the intermodal are part of the industrial premises and should be assessed using the *Noise Policy for Industry* (EPA, 2017) (NPfI)

Appendix 3 of the RING states: *“Where a non-network rail line exclusively servicing one or more industrial sites extends beyond the boundary of the industrial premises, noise from this section of track should be assessed against the recommended acceptable LAeq noise levels from industrial noise sources for the relevant receiver type and indicative noise amenity area...”*

This was developed for situations where rail activities between the development site and the connection to a network line would be a discrete activity. In this instance, as described above, the sections of rail sidings north of the intermodal is not considered a discrete activity, but rather part of the industrial activities at the intermodal. Therefore, activities that occur on this section of the siding such as shunting, switching or storage should be considered part of the industrial activity at the premises and assessed using the NPfl in conjunction with all other operational noise sources.

The EPA recommends that sections of the siding north of the intermodal should be assessed in accordance with the *Noise Policy for Industry* (EPA, 2017) in conjunction with all other operational activities on the premises.

2. Assessment of construction noise and vibration impacts

The original EIS noise impact assessment did not assess rail refurbishment of the whole length of the siding which is proposed to be refurbished in this modification. As such, the construction impacts presented in the modification documents do not appear to consider potential impacts generated by rail refurbishment in the areas proposed in this modification.

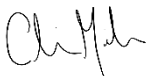
The EPA recommends that construction noise and vibration impacts generated by this proposal – that were not considered in the original EIS or other modifications – be assessed as part of this modification.

Contamination

The EPA reviewed the Supplementary Contamination Investigation and notes that the sample concentrations did not indicate that there would be a contamination issue with the work. Some bonded asbestos was identified during the investigation, however, this would appear to be an isolated occurrence given no further fragments were identified during subsequent walkovers or in soil samples. Therefore, it is considered appropriate that an unexpected finds protocol is applied during the construction works. This is already included in the *Remediation Action Plan* (August 2019). The EPA has no further comments, and previously recommended conditions of consent are considered appropriate for Modification 1.

Should you wish to discuss any of the matters raised above, please contact Anna Timbrell on 9274 6345 or email anna.timbrell@epa.nsw.gov.au

Yours sincerely,



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