

NSW Ports

Environmental Assessment Modification Application No.11 Additional Warehouse

Intermodal Logistics Centre at Enfield Cosgrove Road, Strathfield South

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TABLE OF CONTENTS

2.	INTRODUCTION	3
3.	THE SITE	4
3.1.	Approved Project	4
3.2.	Modification History	4
3.3.	Site Description	5
4.	PROPOSED MODIFICATION	9
4.1.	Description of the Proposal	9
4.2.	Proposed Approval Amendments	11
4.3.	Justification	11
5.	STATUTORY CONTEXT	13
5.1.	Environmental Planning & Assessment Act	13
5.2.	MP05_0147 Condition 1.8	13
6.	ENVIRONMENTAL ASSESSMENT	14
6.1.	Traffic and Access	14
6.2.	Noise	15
6.3.	Contamination	16
6.4.	Air Quality	17
6.5.	Water Quality	17
6.6.	Hazard and Risk	18
6.7.	Vegetation / Landscaping	18
6.8.	Cumulative Construction Impacts	19
7.	CONCLUSION	21
	APPENDIX A - BASELINE CONTAMINATION ASSESSMENT, AREA G	22

FIGURES

Figure 1 - Site Location (source: Google Maps)	6
Figure 2 - Approved Site Layout (source: NSW Ports)	7
Figure 3 - Enfield ILC Plan of Subdivision (source: NSW Ports)	8
Figure 4 - Proposed Warehouse G Location (source: NSW Ports)	10
Figure 5 - Trees to be Removed (source: nearmap)	19

1. INTRODUCTION

This Environmental Assessment (EA) has been prepared by TfA Project Group on behalf of NSW Ports (the Applicant) to support a modification application to the NSW Department of Planning and Environment (DPE). The Project Approval subject to this modification application is for the development of an Intermodal Logistics Centre (ILC) at Enfield approved by the then Minister for Planning under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) on 5 September 2007 (MP05_0147).

The approved project includes an intermodal terminal, empty containers storage facilities, warehousing and light industrial / commercial areas.

This application seeks to modify the approval to establish an additional warehouse to those which have already been approved.

Pursuant to Schedule 6A of the EP&A Act, the approved project is 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. Accordingly, this application is made under section 75W (2) of the EP&A Act.

This EA, which is submitted in support of the application, provides details of the proposed development and addresses relevant economic, social and environmental matters associated with the proposal.

To assist in DPE's determination of the development application, this EA covers the following matters:

- **Section 2:** a site description including approval history and site characteristics;
- **Section 3:** a description of the proposed modification;
- **Section 4:** an assessment of the proposed modification against the relevant planning provisions; and,
- **Section 5:** an environmental assessment of the proposed modification.

2. THE SITE

2.1. Approved Project

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 EP&A Act (MP05_0147).

The Approval provided planning consent for six warehouses (known as Warehouses A to F).

2.2. Modification History

Since MP05_0147 was approved, the approval has been modified on six occasions. Additionally, there is a further Modification Application (MOD 10) currently in the assessment process, and others which have not progressed. These modifications are summarised in Table 1 below:

Modification Number	Status (as at August 2016)	Description	Date of Approval
MOD 1	Approved	Amendment of conditions relating to construction dust monitoring	2 October 2008
MOD 2	Approved	Amendment of conditions to enable staged construction and operation and modified timing of submission of Site Audit Statements	30 March 2009
MOD 3	Withdrawn	-	-
MOD 4	Approved	Amendment of conditions relating to noise walls, internal roads, stormwater detention, development areas and site layout.	27 May 2010
MOD 5	Approved	Relocation and reuse of unsuitable material to Mount Enfield	10 November 2011

MOD 6	Approved	Incorporation of former Toll Site into project site and subdivision of site into 22 allotments	11 December 2012
MOD 7	Withdrawn	-	-
MOD 8	Approved	Amendment of subdivision layout into 23 allotments to facilitate commercial leasing, development and operation of the site	27 November 2013
MOD 9	SEARs issued	Intermodal agricultural commodities storage and handling facility	-
MOD 10	Proponent reviewing submissions	Amendment to freight-related operational activities within the intermodal terminal	-

Modification Application 6 (MOD 6) is of particular relevance 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 intermodal terminal area or as warehousing. MOD 6 broadly identified the range of construction works that Sydney Ports Corporation intended to undertake on the former Toll site i.e. construction works ranging from upgrades to the existing building, pavement and infrastructure to demolition of existing building and infrastructure, ground treatment and levelling, and pavement resurfacing.

The Director-General's assessment report acknowledged that the operational impacts of the former Toll site had been taken into consideration as part of the "background" assessment data for the project's original Environmental Assessment and that activities from the Toll Site had been assumed to continue simultaneously during ILC operations. However, DPE was of the opinion that the construction impacts associated with redeveloping the Toll Site (e.g. demolishing the existing warehouse and / or constructing a new warehouse) required further assessment, particularly in relation to noise and traffic impacts. Details of potential site contamination were yet to be confirmed for the Toll site and therefore was another matter that required further consideration prior to significant redevelopment.

DPE was of the opinion that any future use of the former Toll site should be limited to being consistent with the former operations and impacts of the site, hence the inclusion of Condition of Approval 1.11A. The proposed modification application (i.e. MOD 11) does not propose to change the use of the former Toll site as a "container storage depot and transport logistics centre". The proposed modification will result in part of the new warehouse (Warehouse G) being constructed within the former Toll site area however, the warehouse is generally located within an area of the ILC that was captured as part of the original project application. Vehicle access to the new warehouse will be via the former Toll site or the intermodal terminal area.

2.3. Site Description

The Enfield ILC is located at Cosgrove Road, Strathfield South, and is wholly located within the Strathfield local government area (LGA). The Enfield ILC currently includes:

- 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;
- empty container storage facilities, for the storage of empty containers to be later packed or transferred back to the port by rail;
- an Ecological Heritage Community area;
- other infrastructure including internal roads, administration buildings, stormwater detention basins etc.

Figure 1 below shows the location of the Enfield ILC; Figure 2 shows the approved site layout (without the proposed warehouse shown); and Figure 3 shows the current land title plan:

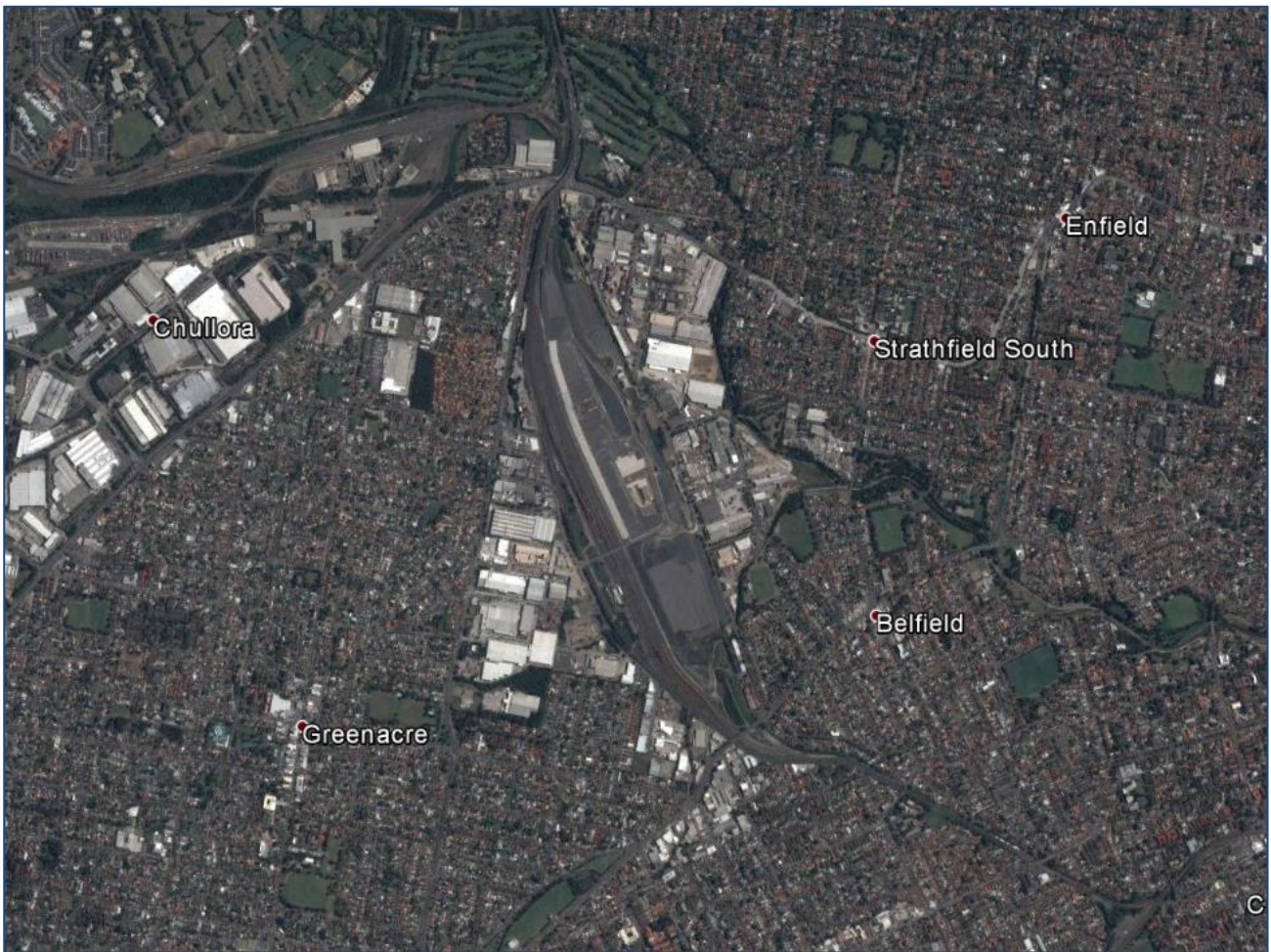


Figure 1 - Site Location (source: Google Maps)



Figure 2 - Approved Site Layout (source: NSW Ports)

SCHEDULE OF PROPOSED LOTS		
LOT	DESCRIPTION	AREA
1	NSW PORTS FREEHOLD LOT - LIGHT INDUSTRIAL/COMMERCIAL LOTS	14,985m ²
2	NSW PORTS FREEHOLD LOT - LIGHT INDUSTRIAL/COMMERCIAL LOTS	4,800m ²
3	NSW PORTS FREEHOLD LOT - LIGHT INDUSTRIAL/COMMERCIAL LOTS	7,760m ²
4	NSW PORTS FREEHOLD LOT - LIGHT INDUSTRIAL/COMMERCIAL LOTS	14,079m ²
5	LEASEHOLD TENANT LOT - INTERMODAL TERMINAL AREA	8,481m ²
6	LEASEHOLD TENANT LOT - WAREHOUSE DISTRIBUTION	76,277m ²
7	LEASEHOLD TENANT LOT - WAREHOUSE DISTRIBUTION	16,364m ²
8	LEASEHOLD TENANT LOT - WAREHOUSE DISTRIBUTION	7,859m ²
9	LEASEHOLD TENANT LOT - WAREHOUSE DISTRIBUTION	12,606m ²
10	LEASEHOLD TENANT LOT - WAREHOUSE DISTRIBUTION	35,740m ²
11	LEASEHOLD TENANT LOT - INTERMODAL TERMINAL AREA	135,540m ²
12	LEASEHOLD TENANT LOT - INTERMODAL TERMINAL AREA	53,917m ²
13	LEASEHOLD TENANT LOT - INTERMODAL TERMINAL AREA	38,299m ²
14	LEASEHOLD TENANT LOT - EXISTING WHEEL LATHE WORKSHOP	7,478m ²
15	LEASEHOLD TENANT LOT - RAIL	6,650m ²
16	LEASEHOLD TENANT LOT - RAIL	3,060m ²
17	LEASEHOLD TENANT LOT - RAIL	6,905m ²
18	LEASEHOLD TENANT LOT - ADMIN BUILDINGS	3,732m ²
19	LEASEHOLD TENANT LOT - SOUTHERN PRECINCT	63,708m ²
20	LEASEHOLD TENANT LOT - VACANT	1600m ²
21	LEASEHOLD TENANT LOT - INFRASTRUCTURE LOT	15,060m ²
22	LEASEHOLD TENANT LOT - INFRASTRUCTURE LOT	29,860m ²
23	LEASEHOLD TENANT LOT - INTERMODAL TERMINAL AREA (FORMER TOLL AREA)	25,457m ²
TOTAL AREA		590,216m ²

PROPOSED EASEMENT NOTE

LOT 22 WILL BE BURDENED BY EASEMENTS FOR ACCESS, AUTHORITY SERVICE EASEMENTS, AND DRAINAGE.



Figure 3 - Enfield ILC Plan of Subdivision (source: NSW Ports)

3. PROPOSED MODIFICATION

3.1. Description of the Proposal

The approved project has approval to construct and operate six warehouses (known as Warehouses A to F – refer Figure 2) 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. The proposed modification subject to this EA is for an additional warehouse to those which are already approved.

The additional warehouse (i.e. Warehouse G) is proposed in the southern portion of Area G (Lot 23) (refer to Figure 4). The warehouse footprint also falls partially within the area known as the former 'Toll Lease Area' site (refer to Figure 4). The Toll site was incorporated into the Part 3A Project Approval under Modification No.6 and is permitted to be used as a container storage depot and transport logistics centre, consistent with former operations of the site. The new warehouse will be consistent with the approved use of Warehouses A to F, that is 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). Hence, the proposed new warehouse will complement the use of the former Toll site and the intermodal terminal.

The new warehouse (Warehouse G) is proposed to be located immediately adjacent to the intermodal terminal area of the Enfield ILC site, allowing for direct access to containers from the intermodal terminal area.

The new warehouse will be approximately 3,300m² in size (building footprint) and will include the warehouse area, a workshop, a washbay, office, and ancillary staff amenities.

The proposed location of the warehouse is on an area that is already levelled and paved. As such, there are no bulk earthworks proposed as part of this application. Some minor excavation work will be undertaken for the installation of services and footings and the installation of landscaping.

No additional staff and visitor parking is required to be provided for this development. Staff associated with the development will park in an existing adjacent parking areas within the former Toll Site / Area G or the Intermodal Terminal. Carparking areas may be reconfigured to allow for safer movement and circulation to and from the site. Currently, light and heavy vehicles use the same crossover access to enter and exit the former Toll site. A new crossover is proposed to be constructed from Mainline Road into the former Toll site to separate light vehicle and existing heavy vehicle movements accessing the area.

Final designs of Warehouse G will be submitted to the Secretary of DPE prior to the commencement of construction in accordance with Condition 1.8 of the Approval.

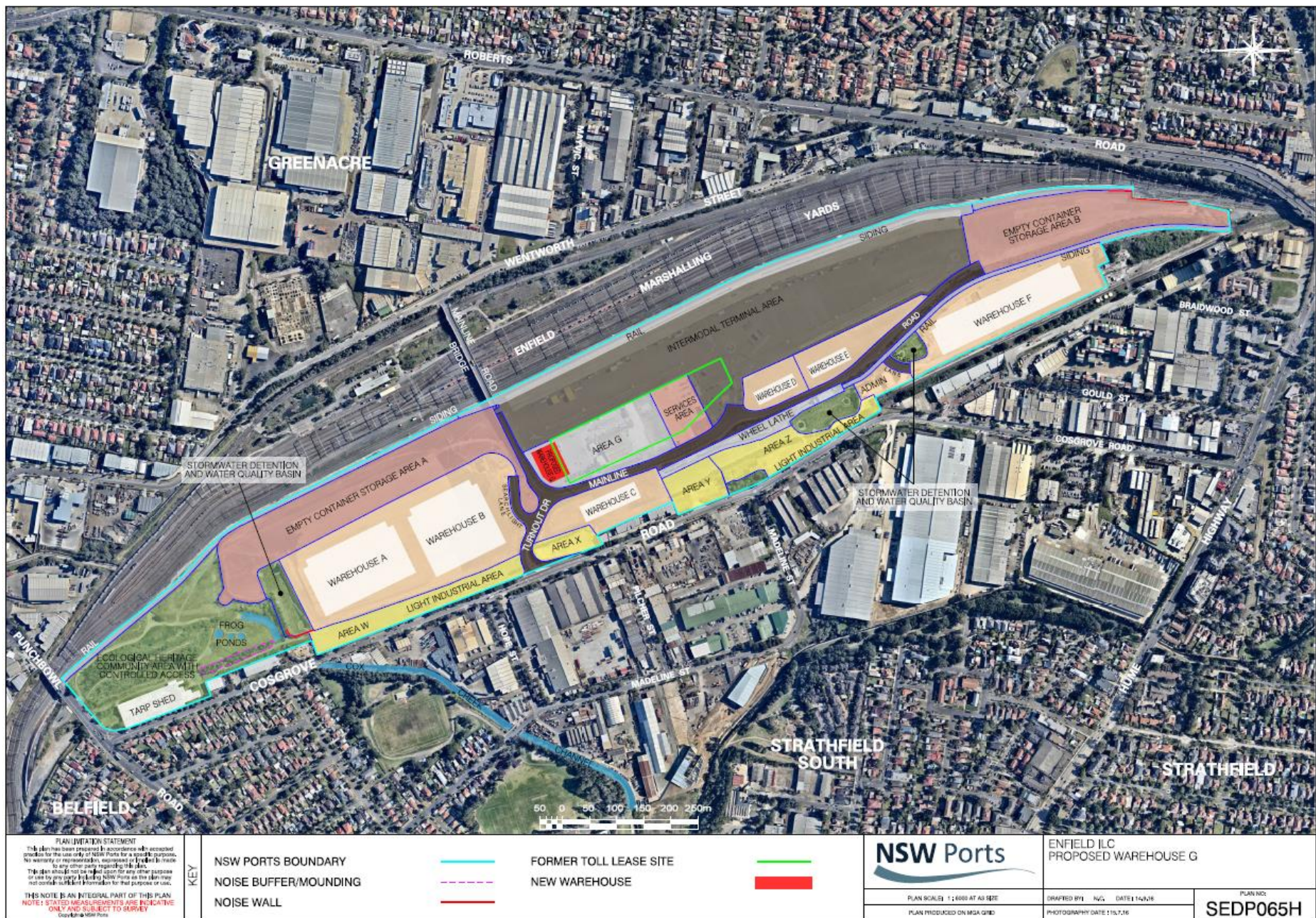


Figure 4 - Proposed Warehouse G Location (source: NSW Ports)

3.2. Proposed Approval Amendments

In order to facilitate the proposed additional warehouse, specific conditions of MP05_0147 will be required to be amended. Table 2 below outlines the proposed modifications (numbering subject to the approval of Modification 10):

Condition	Proposed Modification																
Terms of Approval 1.1	q) the conditions of this approval: <i>Environmental Assessment - Modification Application No. 11 – Additional Warehouse</i> prepared by TFA Project Group dated August 2016; and r) the conditions of this approval.																
Warehousing and Distribution 1.6	<p>The Proponent is permitted to construct and operate six <u>seven</u> warehouses on the site (A to <u>F</u> <u>G</u> inclusive) associated with the project. Each warehouse shall only be permitted to operate for the purpose 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. Each warehouse shall not exceed a height of 12 metres at its highest point (excluding minor ancillary structures such as communications equipment or solar panning), and shall be limited to a footprint no greater than the relevant area specified in Table 1 below. Warehouses shall be generally located and configured consistent with the adjustments made during the detailed design stage as presented in the documents referred to under conditions 1.1m) and 1.1n) of this approval, and particularly, drawing No. SEDP188A (dated 9 July 2012).</p> <p>Table 1 – Maximum Warehouse Footprints</p> <table border="1"> <thead> <tr> <th>Warehouse</th> <th>Maximum Footprint (m²)</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>20,500</td> </tr> <tr> <td>B</td> <td>20,500</td> </tr> <tr> <td>C</td> <td>4,000</td> </tr> <tr> <td>D</td> <td>3,000</td> </tr> <tr> <td>E</td> <td>4,500</td> </tr> <tr> <td>F</td> <td>13,500</td> </tr> <tr> <td><u>G</u></td> <td><u>3,300</u></td> </tr> </tbody> </table>	Warehouse	Maximum Footprint (m ²)	A	20,500	B	20,500	C	4,000	D	3,000	E	4,500	F	13,500	<u>G</u>	<u>3,300</u>
Warehouse	Maximum Footprint (m ²)																
A	20,500																
B	20,500																
C	4,000																
D	3,000																
E	4,500																
F	13,500																
<u>G</u>	<u>3,300</u>																
Toll Lease Area 1.11A	The Proponent shall ensure that operations in the former Toll lease area (also known as Area G) are generally consistent with former operations. Physical works on the site shall be limited to minor upgrades and/or repair and maintenance of the existing buildings, pavement and infrastructure, <u>unless otherwise approved.</u>																

3.3. Justification

An existing operator of the former Toll site has identified a number of benefits to constructing a new warehouse directly adjacent to the intermodal terminal area for their current operations. Benefits include a newer and slightly larger warehouse facility. The location of the new warehouse, directly adjacent to the intermodal terminal area, would also minimise internal truck and forklift movements within the Enfield ILC site allowing for direct container exchange between the warehouse and intermodal terminal. As such, the proposed additional warehouse will allow for more efficient use of the land.

The proposed warehouse will remain consistent with the provisions of Condition 1.6. The warehouse will be operated for the purpose 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. The warehouse will not exceed a height of 12 metres (excluding ancillary structures).

The proposed additional warehouse will not affect the approved maximum throughput of 300,000 TEU (twenty-foot equivalent units) per annum, as measured at the rail to intermodal terminal interface.

4. STATUTORY CONTEXT

4.1. Environmental Planning & Assessment Act

The Project Approval subject to this modification application is for the development of an ILC at Enfield approved by the then Minister for Planning under Part 3A of the EP&A Act on 5 September 2007 (MP05_0147).

Pursuant to Schedule 6A of the EP&A Act, the approved project is 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. Accordingly, this application is made under section 75W (2) of the EP&A Act.

4.2. MP05_0147 Condition 1.8

Condition 1.8 of the Approval MP05_0147 states:

Prior to the commencement of construction of each warehouse, the Proponent shall submit final designs for the warehouse to the Director-General, demonstrating that the warehouse is generally consistent with:

- a) the warehouse designs and layouts presented in the documents referred to under condition 1.1 of this approval;*
- b) the design specifications detailed under condition 1.6 of this approval;*
- c) the findings and recommendations of any approved risk assessment undertaken in accordance with condition 1.7 of this approval; and*
- d) the general principles presented in the Strathfield Consolidated Development Control Plan 2005 (in particular, that component of the Plan formerly being Development Control Plan No. 27 – Industrial Development).*

Condition 1.8 requires that final plans be provided to the Director-General (now Secretary) of DPE prior to construction of the warehouse commencing. Final designs for the warehouse will be submitted to the Secretary in accordance with Condition 1.8 and other documentation required under this Condition.

5. ENVIRONMENTAL ASSESSMENT

5.1. **Traffic and Access**

5.1.1. Construction

The construction of the proposed warehouse will require access to the site by workers in light vehicles, as well as access by heavy vehicles for the delivery of materials and in the form of mobile cranes.

The original Environmental Assessment for the Enfield ILC predicted average construction vehicles accessing the entirety of the site to be around 29 heavy vehicles, and 150-170 light vehicles per day. The majority of site civil works (internal infrastructure, hardstand areas) have been completed and as such, any construction traffic impacts as a result of the proposed warehouse are expected to be significantly less than the vehicles numbers and assessment as provided in the original Environmental Assessment. Construction works for the already approved warehouses on the Enfield ILC site have not as yet commenced. It is unlikely that all warehouses will be constructed at the same time. Details regarding potential cumulative impacts and project staging have been discussed in Section 5.8 below.

It is anticipated that the construction of the warehouse will take between six and nine months.

All construction vehicles associated with the construction of the new warehouse will be able to park within the Enfield ILC. The delivery of materials will occur within the subject site and will not be required to be loaded or unloaded on public roads.

Condition 6.3(b) of the Project Approval requires a Construction Traffic Management Protocol (CTMP) to be prepared. This plan has been prepared by NSW Ports and was approved by the Secretary of DPE on 20 March 2014 in accordance with the overarching respective Environmental Management Plan conditions. The construction related traffic associated with the proposed warehouse will be managed in accordance with the approved CTMP.

5.1.2. Operation

The proposed additional warehouse will not affect the approved maximum throughput of 300,000 TEU (twenty-foot equivalent units) per annum or the traffic movements previously assessed for the Enfield ILC. This is due the existing traffic assessment assessing a throughput of 300,000 TEUs and a condition of approval requiring that this be measured at the rail intermodal terminal interface. Hence, the proposed warehouse would result in the storage and pack / unpack of containers associated with the intermodal terminal being 'divide up' between seven warehouses instead of the six approved warehouses. Therefore, no additional off site operational traffic impacts are proposed above the current approved site operations.

It is anticipated that the proposed warehouse will reduce internal truck movements within the Enfield ILC site with the potential for the intermodal terminal operator to directly deliver and pick up containers from the warehouse using forklifts and other operational equipment.

There will be a minor increase in employee light vehicles accessing the site. During the peak daytime operations for the warehouse, it is estimated that up to 20 staff members could be working in the warehouse and office area. The employee traffic associated with the proposed warehouse development is generally consistent with the original Enfield ILC and will be within the predicted impacts (i.e. trip generation, intersection performance impact etc.) noting that some existing staff members currently operating within the Toll site will relocate to the new offices. The potential traffic impacts associated with staff is minor and does not warrant a revision of the traffic impact assessment.

Employee parking for the proposed development will be within the Toll site directly adjacent to the proposed warehouse or alternatively could be within the intermodal terminal area. To ensure there are no potential parking impacts external to the Enfield ILC, car parking will be provided to ensure the provision of one parking space per employee during peak operations plus 10%. Car parking areas will be designed in accordance with the relevant Australian Standards (*AS1428:1-4 Design for Access and Mobility*, *AS2890.1 Car Parking Facilities*, and *AS 2890.2 Commercial Vehicle Facilities*).

As previously stated, separate heavy vehicle access and light vehicle access points are proposed for the Toll site to ensure safe and efficient movement of vehicles associated with the proposed warehouse and existing site operations of the Toll site. All movements to and from Mainline Road will be in a forward direction.

Condition 6.5(b) of the Project Approval requires an Operational Traffic Management Plan (OTMP) be prepared. This plan has been prepared by NSW Ports and subsequently approved by the Secretary of DPE in accordance with the overarching respective Environmental Management Plan conditions. The operation of the proposed warehouse will be consistent with the approved OTMP.

5.2. Noise

5.2.1. Construction

Construction working hours would be between 7am to 6pm Monday to Friday and 8am to 1pm on Saturdays in accordance with Condition 2.15 of the Project Approval. Typical construction noise is likely to be generated by equipment as considered in the original environmental assessment such as delivery trucks, concrete pumps, mobile cranes, and hand tools.

The original environmental assessment considered noise impacts and mitigation strategies during Stage 4 works (which included the construction of the warehousing on site). Mitigation strategies for construction noise included the formulation and implementation of the Construction Noise Management Plan (CNMP) as well as the construction of permanent noise barriers (in particular the mounded areas at the south east of the site) which are now in place.

Condition 6.3(a) of the Project Approval requires a CNMP to be prepared. This plan has been prepared by NSW Ports and subsequently approved by the Secretary of DPE in accordance with the overarching respective Environmental Management Plan conditions. The construction of the proposed warehouse will be managed in accordance with this approved Plan.

The Project Approval includes conditions relating to construction noise management and sets maximum allowable noise contributions (in accordance with the NSW Industrial Noise Policy) for various locations surrounding the ILC (Conditions 2.13 – 2.16). This is reflected in the CNMP.

Accordingly, the proposed modification will not alter off-site noise impacts beyond those assessed and approved through the original project application.

5.2.2. Operation

The additional warehouse is proposed to operate 24 hours per day, 7 days per week in accordance with existing approved operations. Generally, noise associated with the warehouse will include the operation of forklifts and air compressors /

generators, as well as general container handling. The majority of this noise will be generated inside the proposed warehouse building.

It is proposed that the access to the warehouse will be directly via the intermodal terminal area. As a result of this proposed building orientation, the design will assist with the screening of noise from the warehouse operations. It will also provide an additional 'noise buffer' to the intermodal terminal area and therefore provide further noise screening to residential areas on the eastern side of the ILC.

Operations associated with the new warehouse will be similar to those assessed through the previous noise assessments for the Enfield ILC. Noise impacts would be consistent with those for the other warehouses proposed in the original application and the proposal would not introduce any additional significant noise sources or noise impacts that have not already been considered.

Condition 6.5(a) of the Project Approval requires an Operational Noise Management Plan (ONMP) be prepared. This plan has been prepared by NSW Ports and subsequently approved by the Secretary of DPE in accordance with the overarching respective Environmental Management Plan conditions. Operations will be managed in accordance with the approved ONMP.

The Project Approval includes conditions relating to operational noise management and sets maximum allowable noise contributions (in accordance with the NSW Industrial Noise Policy) for various locations surrounding the ILC (Conditions 2.13, 2.17 – 2.19A). These requirements have been included in the ONMP.

Operations associated with the proposed additional warehouse will comply with the project's approved noise limits and will continue to be managed in accordance with the ONMP. Accordingly, the proposed modification will not alter off-site noise impacts beyond those assessed and approved through the original project application.

5.3. Contamination

In 2013 a Baseline Contamination Assessment was undertaken for the area of the Enfield ILC known as Area G. The proposed warehouse falls entirely within the Area G parcel of land and therefore within the investigation area of the Assessment. The Baseline Contamination Assessment is included at **Appendix A**.

The Assessment undertaken for Area G confirms the proposed warehouse site is free from contamination and states:

"The results of the field observations and laboratory analysis of selected soil samples, in which no results exceeded the site criteria indicate that, the underlying fill materials and natural clayey soils within the investigation area of the site have not been significantly impacted by current or historical site operations. Based on these findings, it is considered that the investigation area is unlikely to present a risk to users of the site in relation to soil contamination and therefore the portion of the site is suitable for continued commercial / industrial uses."

Since that time there have been no known incidences of pollution on site (i.e. fuel spill, storage of material etc.) that would potentially lead to a change in these results. Hence there are no known contamination risks associated with the construction or operation of the proposed warehouse. NSW Ports Overarching Operational Environmental Management Plans specify mitigation measures that reduce the risk of operational activities potentially causing future contamination of the site.

5.4. Air Quality

5.4.1. Construction

Potential air quality impacts during the construction of the proposed warehouse are generated through dust and construction equipment emissions.

Construction air emissions may be generated by equipment such as delivery trucks, concrete pumps, mobile cranes, and hand tools. Air emissions will be minimal and unlikely to have an impact on regional air quality. Mitigation measures in respect to minimising emissions identified within the approved CEMP will be implemented in the construction of the proposed warehouse.

The proposed warehouse site is already paved and any disturbance to the area (i.e. for installation of services, footings etc.) will be relatively minor, thereby minimizing potential dust impacts.

Notwithstanding the above, Condition 6.3(e) of the Project Approval requires a Construction Dust Management Protocol be prepared. This plan has been prepared by NSW Ports and subsequently approved by the Secretary of DPE in accordance with the overarching respective Environmental Management Plan conditions. Construction practices and mitigation measures will be consistent with this approved Plan.

5.4.2. Operation

Sources of air emissions during operation include forklifts, heavy vehicles and light employee vehicles. Given traffic volumes will not significantly increase as a result of the proposal, potential air quality impacts as a result of operations are consistent with those of the original environmental assessment and, given the location of the proposed warehouse, suitably located away from residential areas in order to minimise impacts on those areas.

5.5. Water Quality

5.5.1. Construction

As identified in the original environmental assessment, the main water quality impacts during construction would be the export of sediments and other pollutants such as nutrients, to the local waterways due to the exposure of soils to erosion. However, the proposed warehouse site is already paved and any disturbance to the area (i.e. for installation of services, footings etc.) will be relatively minor, thereby minimizing the risk of erosion and sediment loss.

Notwithstanding the above, Condition 6.2 of the Project Approval requires a Construction Environmental Management Plan (CEMP) be prepared and that it include details of measures to monitor and minimise soil erosion and the discharge of sediment during construction activities. This plan has been prepared by NSW Ports and subsequently approved by the Secretary of DPE.

Water quality management measures consistent with the CEMP will be implemented to minimise erosion and sediment loss.

5.5.2. Operation

The Enfield ILC (including the location of the proposed warehouse) is currently serviced by an existing stormwater system. This stormwater system includes three stormwater basins that capture, retain, and treat stormwater before it is discharged from the site.

Stormwater from the subject site will be discharged via the existing system. As stated in the original environmental assessment, the detention basins will capture and treat the 'first flush' (represented by the first 10mm of rainfall runoff). Generally, capturing and treating up to 10mm of rainfall from all storm events would result in the treatment of more than 90% of the average annual runoff volume from the site.

The washbay will be designed to comply with Sydney Water's requirements including for the treatment and discharge of water.

In accordance with the original environmental assessment, any potential accidental spill associated with the operation of the warehouse will be contained within the first flush containment basin by isolation valves that ensure that the spill is totally contained. Spills or incidents within the warehouse will be cleaned following occurrence and managed in accordance with the OEMP.

5.6. Hazard and Risk

Dangerous goods are permitted to be handled within certain areas of the Enfield ILC. Containers that include dangerous goods may only transit through the proposed warehouse site, however they are not permitted to be packed, repacked, or allow for the decanting of dangerous goods without a further risk assessments being undertaken in accordance with Condition 1.7 of the Project Approval. The proposed warehouse does not propose to pack, repack or decanter dangerous goods and hence a risk assessment prepared in accordance with Condition 1.7 of the Project Approval is not required at this point in time.

5.7. Vegetation / Landscaping

In order to facilitate the construction of the new crossover off Mainline Road, two *Melaleuca* trees will be required to be removed (see Figure 5). The trees to be removed are less than 10m in height and do not form part of an established ecological community. The trees are isolated from other pockets of vegetation and as such, do not form part of a continuous vegetation link for fauna.



Figure 5 - Trees to be Removed (source: nearmap)

All tree removal works will be in compliance with relevant approved Environmental Management Plans including the Landscape and Ecological Area Management Plan as per Condition 6.3(d) of the Project Approval.

A continuous strip of landscaping is proposed to be provided along the two road frontages of the proposed warehouse with Mainline Road to provide visual relief and amenity from road areas. Landscaping will consist of locally-endemic native species in compliance with the Project Approval. Stormwater from the proposed warehouse will be captured in a rainwater tank and used for the irrigation of the landscaped areas.

All landscaping works will be in compliance with relevant approved Environmental Management Plans including the Landscape and Ecological Area Management Plan as per Condition 6.3(d) of the Project Approval.

5.8. Cumulative Construction Impacts

The construction of the Enfield ILC has been undertaken in a staged approach (as per the table below), with some stages being undertaken either fully or partially in parallel.

Phase	Activities
Stage 1 – Remediation/Landscaping Mound	<ul style="list-style-type: none"> • Removal of contaminated material/land-farming on-site; • Removal of unsuitable material from site; • Construction of all internal sealed haul roads; • Construction of the stormwater detention basins; • Construction of landscaping mounds including associated earthworks; • Construction of off-site noise barrier; and • Preparation of light industrial/commercial area along Cosgrove Road.

Stage 2 – Detailed earthworks and drainage	<ul style="list-style-type: none"> • Site grading including cut and fill works to level site; • Construction of retaining walls/embankments; • Site stabilisation works; • Construction of stormwater trunk drainage system; • Development of Community and Ecological Area (details to be determined); and • Relocation of services.
Stage 3 – Road and rail infrastructure, intermodal and empty container storage areas	<ul style="list-style-type: none"> • Construction of off-site access points (Overbridge); • Construction of reinforced earth wall for road embankment; • Northern Bridge to empties area; • Installation of services; • Relocation of existing rail access to wheel lathe; • Construction of new railway line and sidings; and • Pave intermodal area, container storage areas and internal roads.
Stage 4 – Warehousing and final works	<ul style="list-style-type: none"> • Construct warehouses, administration and maintenance buildings; • Pavement areas; and • Final landscaping.
Stage 5 – Commercial / Light Industrial buildings	<ul style="list-style-type: none"> • Construct buildings along Cosgrove Road for commercial / light industrial and ancillary retail / refreshment uses

The majority of works associated with Stage 1, Stage 2, and Stage 3 have been completed and the proposed warehouse subject to this application will form part of the Stage 4 works. No warehouses have been constructed on site to date.

All impact assessment studies that were undertaken as part of the original assessment assumed that the construction of Stage 4 of the Enfield ILC (i.e. the construction of all six warehouses and all pavement areas not associated with Stage 3) was to occur concurrently.

Specifically, the scenario of all six warehouses being constructed at the same time was used (as a worst case scenario) for the Traffic Impact Assessment, the Stormwater Quality and Soil and Water Management Assessment, the Noise and Vibration Impact Assessment, and the Air Quality Assessment.

For the construction of the proposed warehouse, it is anticipated that one other warehouse will be under construction at the same time. The cumulative construction impacts of the proposed warehouse therefore fall within impacts as assessed in the original environmental assessment.

6. CONCLUSION

This Environmental Assessment (EA) has been prepared by TfA Project Group on behalf of NSW Ports (the Applicant).

The EA has been prepared to support an application to the NSW Department of Planning and Environment (DPE) under Section 75W of the *Environmental Planning and Assessment Act 1979* (EP&A Act) for an additional warehouse at the Intermodal Logistics Centre (ILC) at Enfield.

The proposal has been assessed against the relevant legislative provisions. From this assessment, the following conclusions are able to be drawn:

- The proposed additional warehouse is a suitable land use for the Enfield ILC;
- The proposed additional warehouse will facilitate the ILC achieving the strategic goal of transporting containers by rail to and from Port Botany;
- Through providing direct access to the intermodal area, the proposal could reduce the number of internal truck and / or forklift movements and the handling of containers;
- There are unlikely to be any significant environmental impacts as a result of the proposed modification.

On the basis of the above, it is considered sufficient planning grounds exist to warrant the proposal and the modification application is recommended for DPE approval.

APPENDIX A - BASELINE CONTAMINATION ASSESSMENT, AREA G