



ADDENDUM TO PLANNING PROPOSAL

**TO REZONE THE SOUTHERN SECTION OF
THE ENFIELD INTERMODAL LOGISTICS
CENTRE SITE FROM IN1 GENERAL
INDUSTRIAL TO RE2 PRIVATE RECREATION**

**PART LOT 14, DP 1007302 AT COSGROVE
ROAD, STRATHFIELD SOUTH**

1. PURPOSE OF DOCUMENT

The purpose of this document is to form an addendum to the Planning Proposal titled "PLANNING PROPOSAL TO REZONE THE SOUTHERN SECTION OF THE ENFIELD INTERMODAL LOGISTICS CENTRE SITE" prepared by Strathfield Council (January 2015).

This Planning Proposal was endorsed and submitted to Department of Planning & Environment in February 2015.

The Department responded in writing (received by Council in March 2015) to request for additional information for their assessment.

This addendum is intended to provide additional justification / information to address the Department's March correspondence (refer Attachment 1), in addition to the Council's endorsed Planning Proposal document.

2. Sydney Metropolitan Plan - A Plan for Growing Sydney

Direction 1.5 Enhance capacity at Sydney's Gateways and Freight Networks

Enfield Intermodal Logistics Centre (Enfield ILC) is identified in the Sydney Metropolitan Plan being a planned intermodal terminal facility.

This Planning Proposal does not intend to constrain or reduce the operational capacity of the planned Enfield ILC. The proposal seeks to apply the appropriate zoning consistent with the 2007 state government Part 3A approval which reserved the southern section of the Enfield ILC site as a 'Community & Ecological Area'.

The southern section of the Enfield ILC (i.e. the Community and Ecological Area) has been set to provide opportunity to incorporate ecological enhancement, community activities and also heritage interpretation. It is also intended to serve as a buffer between operations on the site and residences to the south of the site (refer Attachment 2 – refer to Page 5 and Figure 3 Concept Layout of the approved Environmental Assessment).

The original Part 3A application clearly did not indicate that the subject area was reserved for future expansion of the facility, therefore this Planning Proposal is definitely not inconsistent with this direction.

Direction 1.9 Support Priority Economic Sectors

The Metropolitan Plan indicates that the growth of priority industry has to be supported by planning for their land use needs. The following is Council's response to the industrial lands strategic assessment checklist for rezoning of existing industrial land to other uses:

Strategic Assessment Checklist	Response
Is the proposed rezoning consistent with State and/or Council strategies on the future role of industrial lands	The Sydney Metropolitan Plan – A Plan for Growing Sydney identified the subject precinct as 'Enfield Intermodal Logistics Centre'. SGS Economic Land Use Study stated that the Intermodal Logistics Centre at Enfield will form

	<p>part of a network of existing and planned intermodal terminal facilities in Sydney.</p> <p>Whilst the proposed rezoning would result in minor reduction in amount of the former Special Uses 5(b) - Railways (e.g. 4.5 hectares or approximately 7% of the overall 57.6 hectares Enfield ILC site), it is consistent with the state government part 3A approval for the planned Enfield ILC which includes the Community & Ecological Area at southern section of the site.</p> <p>It should be noted that 'Mount Enfield' mound has been expanded due to fill from the construction of the Enfield ILC site having been re-located there. This has reduced the amount of level area in the 4.5 hectare 'Community & Ecological Area'. Therefore the theoretical amount of usable land for industrial purposes is well less than 4.5 hectares.</p> <p>The original Part 3A application as assessed by the Department of Planning would have taken into account all necessary studies including the economic consideration. As the land has already been reserved for Community & Ecological Area through the approval, it is not relevant to re-consider this matter.</p> <p>In addition, one of the stated objectives of the planned Enfield ILC in its Part 3A approval was 'to enhance the quality of the local environment by providing community and ecological benefits on the site' (refer Attachment 2).</p> <p>Hence, the rezoning of southern section of the Enfield ILC is not inconsistent with the State and Council's strategies for a planned intermodal terminal facility at Enfield.</p>
<p>Is the site:</p> <ul style="list-style-type: none"> • Near or within direct access to key economic infrastructure? • Contributing to a significant industry cluster 	<p>The subject site is located to the southern section of the Enfield ILC precinct and is adjacent to the Cosgrove / Punchbowl Rd industrial precincts.</p> <p>However, in accordance with the Part 3A approval the subject area was not planned in accordance with the Part 3A approval to contribute to the Enfield Intermodal Terminal facility in an operational sense as the subject area has been reserved as a 'Community & Ecological Area'.</p>
<p>How would the proposed rezoning impact the industrial land stocks in the subregion or region and the ability to meet future demand for industrial land activity?</p>	<p>The current industrial land stock in Strathfield LGA is 262.3 hectares. The rezoning proposal only contributes to 1.8% of the overall industrial land stock which would have minimal impact on the existing industrial land stocks.</p> <p>As part of the Comprehensive Strathfield LEP 2012, Council has already ensured sufficient industrial land stocks by exceeding the sub-regional employment capacity targets by 33%.</p>

<p>How would the proposed rezoning impact on the achievement of the subregion/region and LGA employment objectives</p>	<p>The Draft Inner West Subregional Strategy (2007) identifies an additional employment capacity target of 1,500 for the Strathfield LGA by 2031.</p> <p>The SGS Strathfield Economic Land Use Study indicated that the Strathfield LEP 2012 will deliver the additional employment capacity of 2,000 by 2031 (33% higher than the subregional target).</p> <p>As indicated above, the rezoning proposal only result in reduction of approximately 4.5 hectares of former Special Uses Railway zoned land (1.8% of the overall available general industrial land stock in Strathfield) which is considered of minor impact as Council has already achieved 33% more than the subregional employment capacity target as part of the comprehensive Strathfield LEP process.</p>
<p>Is there a compelling argument that the industrial land cannot be used for an industrial purpose now or in the foreseeable future and what opportunities may exist to redevelop land to support new forms of industrial land uses such as high-tech or creative industries?</p>	<p>The Part 3A Project Approval in 2007 has set the direction of the planned Enfield Intermodal Logistics Centre. As indicated above, the southern section of the Enfield ILC has been reserved for 'Community & Ecological Area' as buffer to the operational area to the north.</p> <p>Council therefore considers it is the state and Council's responsibility to revert the subject area to RE2 Private Recreation zoning consistent with the intent of the 'Community & Ecological Area' land use.</p>
<p>Is the site critical to meeting the need for land for an alternative purpose identified in other NSW Government or endorsed Council planning strategies?</p>	<p>As indicated above the subject site has been identified in the Part 3A project approval as 'Community & Ecological Area' use.</p> <p>As indicated in the below analysis, the site is critical to serve as the 'Community & Ecological Area'.</p>

Direction 3.2 Create a network of interlinked, multipurpose open and green space across Sydney

The Metropolitan Plan encourages a more strategic approach in planning for Sydney's open space network. This includes identifying the potential open space and connecting to the existing open space which will support the creation of a 'green-grid'.

As indicated in the Open Space Analysis diagram below, the subject site is located within a strategic location which assists to establish an open space green link from the Cooks River open space network along the Coxs Creek through Cooke Park and Begnell Field. This open space network along Coxs Creek has the opportunity to extend to the 'Community & Ecological Area' at the Enfield ILC, by implementing the full approved area of this asset, that has been promised to the community.

As indicated in the Analysis diagram, the Enfield ILC 'Community & Ecological Area' also provides green space for adjacent areas that have low level of open space (i.e. Belmore and Lakemba). This strategic open space will serve a wider regional catchment (e.g. the nearby medium – high density residential areas) with its connectivity to other regional / local open space.

Therefore, this will not only create a physical green ecological link to improve biodiversity but also a recreational pedestrian / cycle link between open space areas.

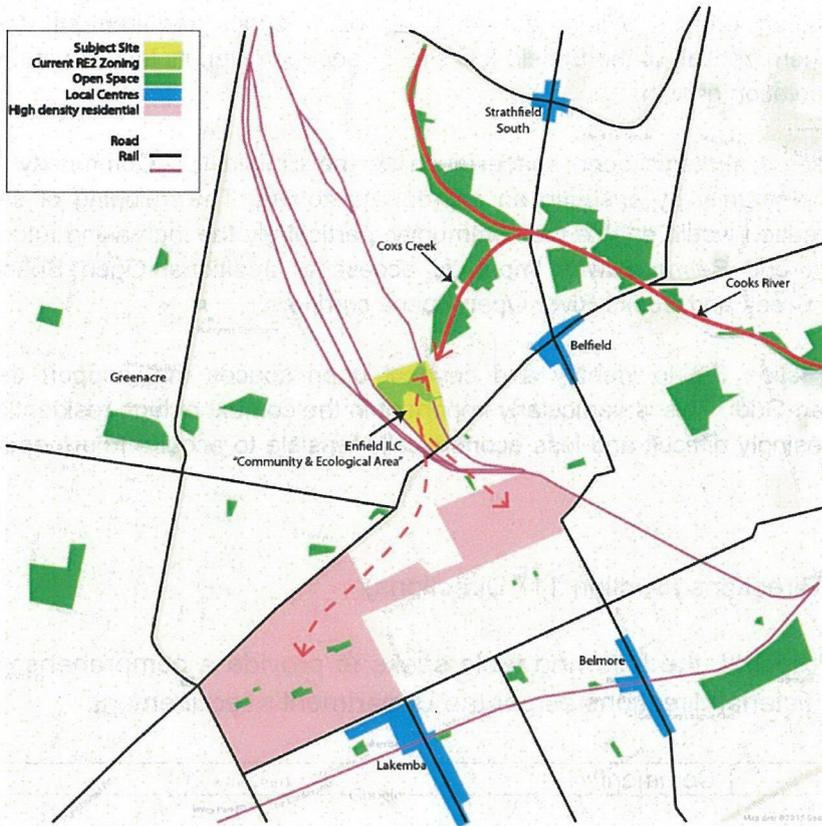


Figure 1: Open Space Analysis

Further demographic analysis has indicated the following results for the nearby town / local centres:

Town / Village Centre	LGA	LGA Growth Rate	2031 Projected Population Growth	Additional Open Space required (ha)*
Lakemba	Canterbury	1.25	3,938	11.1
Belmore	Canterbury	1.25	3,192	9.0
Belfield	Canterbury	1.25	1,184	3.4
Belfield	Strathfield	1.36	499	1.0
Strathfield South	Strathfield	1.36	1,177	3.3
Greenacre	Strathfield	1.36	526	1.5
Greenacre-Chullora	Bankstown	1.26	5,596	15.8
			TOTAL	45.1

* Note: Using the ratio of 2.83 ha/1000 persons (rules of thumb)

As the demographic for this region will continue to grow in the next 20 years, it is strategically significant to identify additional open space to maintain the amenity of residential area. The table above shows that an indicative additional 45.1 ha open space (based on rules of thumb) will be required to support the population growth. Within the 45.1 ha open space requirement, the approximately 4.5 ha of the southern section of the Enfield ILC site is required given its location in the context of surrounding future population growth.

Therefore, it is important to reserve strategic open space (such as the Enfield ILC Community & Ecological Area) to serve the community by ensuring an appropriate zoning. The rezoning of the subject site to RE2 Private Recreation would enable the community, particularly the increasing future population in Belfield, Lakemba and Belmore, with improved access to additional Open Space facilities and access to the Coxs Creek and Cooks River Open Space corridors.

This is consistent with the Direction 3.2 to identify and connect open spaces that support the development of a city-wide 'Green-Grid'. This is particularly important in the context of high residential growth as it will becoming increasingly difficult and less economically feasible to acquire future open space in the future.

3. Assessment of Ministerial Directions (Section 117 Directions)

In addition to the Planning Proposal, the following table seeks to provide a comprehensive assessment of all relevant ministerial directions as per the Department's requirement:

No.	Title	Comment
1	Employment & Resources	
1.1	Business and Industrial Zones	Inconsistent. As indicated above and in the Planning Proposal, the inconsistency with this direction is of minor significance. This Planning Proposal will result in minor decrease of industrial land in Strathfield LGA (e.g. approximately 1.8% of the overall 262.3 hectares IN1 zoned area). The rezoning is unlikely to affect the Council's supply of industrial land and is not required to achieve the employment targets (given Council's LEP has already achieved 33% more than the draft inner west subregional plan required).
1.2	Rural Zones	Not applicable
1.3	Mining, Petroleum Production and Extractive Industries	Not applicable
1.5	Oyster Aquaculture	Not applicable
2	Environmental and Heritage	
2.1	Environment Protection Zones	Consistent. The proposed RE2 Private Recreation zoning assists to protect the existing and adjacent habitat area (currently zoned RE2 Private Recreation) for Green Golden Bell Frog (GGBF). The subject area includes the existing frog habitat area.
2.2	Coastal Protection	Not applicable
2.3	Heritage Conservation	Consistent. The Tarpaulin Shed which is referenced under the State Rail Authority heritage register, is located within the subject

		area. The rezoning does not compromise the heritage significance of the building, however, it may provide opportunity to adaptively reuse the building for or ancillary to the recreational related activities. It is noted that this building is not heritage listed under the Strathfield LEP.
2.4	Recreation Vehicle Areas	Not applicable
3	Housing, Infrastructure and Urban Development	
3.1	Residential Zones	<p>Consistent.</p> <p>As the previous diagram demonstrates, the proposed private recreation zoned area connects to the existing open space corridor along Coxs Creek. It also creates a buffer to the Enfield ILC operation particularly from the adjacent low-high density residential area to the east.</p> <p>This meets the objective of this direction that it makes efficient use of existing infrastructure (i.e. extend and interlink to the Coxs Creek and Cooks River open space corridors) and ensure that the future increased population in this catchment has improved access to open space.</p>
3.2	Caravan Parks and Manufactured Home Estates	Not applicable
3.3	Home Occupations	Not applicable
3.4	Integrating Land Use and Transport	Not applicable
3.5	Development Near Licensed Aerodromes	Not applicable
3.6	Shooting Ranges	Not applicable
4	Hazard and Risk	
4.1	Acid Sulfate Soils	Not applicable as the subject site is not affected by Acid Sulfate Soils
4.2	Mine Subsidence and Unstable Land	Not applicable
4.3	Flood Prone Land	<p>Not inconsistent.</p> <p>A section of the subject site has 1:100 flood affectation zone. The Planning Proposal does not contradict or hinder application of flood prone land provisions in the Strathfield LEP.</p> <p>Council's drainage engineer and external drainage consultant have indicated that the Planning Proposal to rezone is acceptable subject to compliance with the following flooding and overland flow related requirements:</p> <ol style="list-style-type: none"> 1. No change to the existing surface ground levels shall occur and no imported fill shall be used. 2. No barriers that will cause obstruction or diversion to the overland flow of stormwater runoff shall be used.
4.4	Planning for Bushfire Protection	Not applicable
5	Regional Planning	
5.1	Implementation of Regional Strategies	Not applicable
5.2	Sydney Drinking Water Catchments	Not applicable
5.3	Farmland of State and Regional Significance on the NSW Far North Coast	Not applicable
5.4	Commercial and Retail	Not applicable

	Development along the Pacific Highway, North Coast	
5.5	Development in the vicinity of Ellalong, Paxton and Millfield (Cessnock LGA)	Not applicable
5.6	Sydney to Canberra Corridor (Revoked 10 July 2008. See amended Direction 5.1)	Not applicable
5.7	Central Coast (Revoked 10 July 2008. See amended Direction 5.1)	Not applicable
5.8	Second Sydney Airport: Badgerys Creek	Not applicable
5.9	North West Rail Link Corridor Strategy	Not applicable
6	Local Plan Making	
6.1	Approval and Referral Requirements	Consistent. As outlined in the Planning Proposal, Council has been regularly and consistently liaising with Sydney Ports / NSW Ports since 2007 regarding the appropriate zoning for this area in accordance with the Part 3A Project Approval.
6.2	Reserving Land for Public Purposes	Consistent. The Planning Proposal will not affect any land reserved for a public purpose. In addition, the rezoning of the subject site to RE2 provides an opportunity to connect to Council owned local open space corridor (i.e. Coxs Creek).
6.3	Site Specific Provisions	Not applicable
7	Metropolitan Planning	
7.1	Implementation of A Plan for Growing Sydney	Inconsistent. The inconsistency with this direction is of minor significance as justified in Section 2.

4. Comprehensive Assessment of State Environmental Planning Policies

In addition to the Planning Proposal, the following table seeks to provide a comprehensive assessment of all relevant State Environmental Planning Policies as per the Department's requirement:

SEPP Title	Comment
State Environmental Planning Policy No 1— Development Standards	Not applicable
State Environmental Planning Policy No 14— Coastal Wetlands	Not applicable
State Environmental Planning Policy No 15— Rural Landsharing Communities	Not applicable

State Environmental Planning Policy No 19— Bushland in Urban Areas	Not applicable
State Environmental Planning Policy No 21— Caravan Parks	Not applicable
State Environmental Planning Policy No 26— Littoral Rainforests	Not applicable
State Environmental Planning Policy No 29— Western Sydney Recreation Area	Not applicable
State Environmental Planning Policy No 30— Intensive Agriculture	Not applicable
State Environmental Planning Policy No 32— Urban Consolidation (Redevelopment of Urban Land)	Not applicable
State Environmental Planning Policy No 33— Hazardous and Offensive Development	Not applicable
State Environmental Planning Policy No 36— Manufactured Home Estates	Not applicable
State Environmental Planning Policy No 39— Spit Island Bird Habitat	Not applicable
State Environmental Planning Policy No 44— Koala Habitat Protection	Not applicable
State Environmental Planning Policy No 47— Moore Park Showground	Not applicable
State Environmental Planning Policy No 50— Canal Estate Development	Not applicable
State Environmental Planning Policy No 52— Farm Dams and Other Works in Land and Water Management Plan Areas	Not applicable
State Environmental Planning Policy No 55— Remediation of Land	Inconsistent. Whilst there is low level of contamination in section of the fill of the “Mt Enfield” mound, according to NSW Ports, the contamination issue does not preclude public access. Furthermore, should there be any unforeseeable contamination issues, these can also be dealt with in the interim by restricting access for impacted areas until satisfactorily remediated for recreational purposes.

State Environmental Planning Policy No 59— Central Western Sydney Regional Open Space and Residential	Not applicable
State Environmental Planning Policy No 62— Sustainable Aquaculture	Not applicable
State Environmental Planning Policy No 64— Advertising and Signage	Not applicable
State Environmental Planning Policy No 65— Design Quality of Residential Flat Development	Not applicable
State Environmental Planning Policy No 70— Affordable Housing (Revised Schemes)	Not applicable
State Environmental Planning Policy No 71— Coastal Protection	Not applicable
State Environmental Planning Policy (Affordable Rental Housing) 2009	Not applicable
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	Not applicable
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008	Not applicable
State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004	Not applicable
State Environmental Planning Policy (Infrastructure) 2007	Consistent. The proposed rezoning of the southern section of the Enfield ILC to RE2 seeks to apply the appropriate zoning for the 'Community & Ecological Area' as part of the Part 3A Project Approval.
State Environmental Planning Policy (Kosciuszko National Park—Alpine Resorts) 2007	Not applicable
State Environmental Planning Policy (Kurnell Peninsula) 1989	Not applicable
State Environmental Planning Policy (Major Development) 2005	Not applicable
State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007	Not applicable

State Environmental Planning Policy (Miscellaneous Consent Provisions) 2007	Not applicable
State Environmental Planning Policy (Penrith Lakes Scheme) 1989	Not applicable
State Environmental Planning Policy (Rural Lands) 2008	Not applicable
State Environmental Planning Policy (SEPP 53 Transitional Provisions) 2011	Not applicable
State Environmental Planning Policy (State and Regional Development) 2011	Not applicable
State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011	Not applicable
State Environmental Planning Policy (Sydney Region Growth Centres) 2006	Not applicable
State Environmental Planning Policy (Three Ports) 2013	Consistent. As justified above, the proposal does not hinder the application of this SEPP.
State Environmental Planning Policy (Urban Renewal) 2010	Not applicable
State Environmental Planning Policy (Western Sydney Employment Area) 2009	Not applicable
State Environmental Planning Policy (Western Sydney Parklands) 2009	Not applicable

5. Draft Inner West Sub-regional Strategy (IWSS) & SGS Economic Land Use Study 2010

One of the key directions from the Draft Inner West Sub-regional Strategy is to protect employment lands. Council prepared the SGS Economic Land Use Study in response to the IWSS and to support the review of Strathfield LEP 2012. In broad terms, the Enfield Intermodal Logistics Centre is referenced in its significant economic role in both of these documents.

The following results seek to compare the targets in the IWSS and what the Strathfield LEP 2012 actually delivers:

Comparison of IWSS & LEP 2012

Strathfield	Previous	IWSS target	Strathfield LEP 2012
Industrial Land Stock	198.4 ha (in 2006) previously zoned industrial (4)	N/A	262.3 ha zoned IN1 (without road)

Employment	19,200 (in 2001)	20,700	21,200
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This table demonstrates that Council's LEP 2012 has delivered the IWSS targets and above. The 4.5 ha industrial zoned land in the southern section of the Enfield ILC is not required to meet the local strategic employment demand. However, the alternative use as the open space provides a better strategic amenity outcome to serve the longer term residential growth in the surrounding area (see Section 2 for detailed discussion).

Additionally, the Planning Proposal is also consistent with the stated key direction F1 of the IWSS 'Increase Access to Quality Parks and Public Places'. As indicate in Section 2 of this Report, the Enfield ILC 'Community & Ecological Area' presents a strategically significant open space area given its connectivity to the Coxs Creek and Cooks River green corridor.

The rezoning will ensure the access to open space and green corridors be improved and extended to the adjacent high density residential suburbs (e.g. Belmore and Lakemba) which is currently already undersupply in terms of open space. It is strategically important to reserve the open space (as already approved in the Part 3A) to serve the increasing population and community in the surrounding suburbs.

Whilst the Enfield ILC provides important regional freight movement benefits, the 4.5 ha land in the southern section of the site should be looked at independently. This is because the subject site is physically separated to the main Enfield ILC operational land to the south by the RE2 zoned land. Additionally, the "Mt Enfield" mound is also located on the subject site, which reduces the practicality of the areas for potential operational uses.

It is also important to note the fact that the original 2007 Part 3A approval has already assessed the impact (e.g. economic and land contamination considerations) and nominated the southern section of the Enfield ILC as the 'Community & Ecological Area'. The rezoning proposal essentially reflects the intent and community expectation of this Part 3A approval.

for later re-use or for return to the Port. The layout of the proposed ILC at Enfield is shown in **Figure 3**. It comprises:

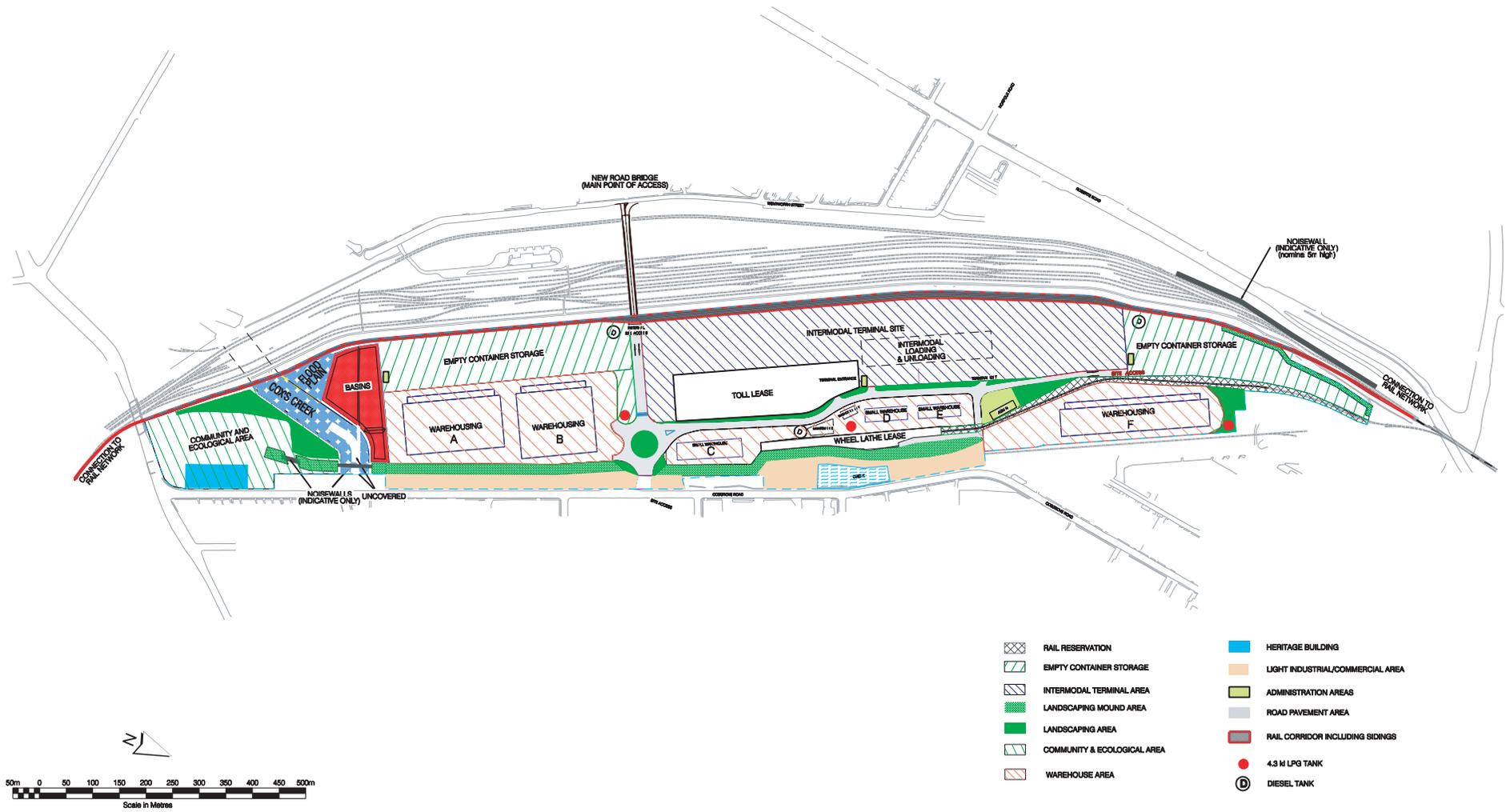
- An Intermodal Terminal for the loading and unloading of containers between road and rail and short term storage of containers;
- Warehousing for the packing and unpacking of containers and short-term storage of cargo;
- Empty Container Storage Facilities for the storage of empty containers for later packing or transfer by rail;
- A Light Industrial / Commercial Area developed for uses preferably complementary to operations at the ILC. The area would also act as an interface to adjacent uses along Cosgrove Road;
- A Community and Ecological Area which would provide the opportunity to incorporate ecological enhancement and community activities. The area would also serve as a buffer between operations on the site and residences to the south of the site; and
- Other works, comprising construction of a road bridge over the new Enfield Marshalling Yards for access to Wentworth Street, construction of the rail links from the existing rail freight line to the ILC site and a noise wall on RailCorp land to the north west of the site.

The objectives of the proposal are:

- To contribute towards the achievement of a 40% rail mode share for container transport through the delivery of additional intermodal capacity within close proximity to a significant freight catchment area within the Sydney metropolitan area;
- To create an integrated ILC that will accommodate related freight operations that complement each other;
- To contribute to an existing and future intermodal network that maximises the movement of freight by rail in an efficient and reliable manner;
- To provide greater efficiency in the movement of freight to/from Port Botany, facilitating the growth of port trade as a major contributor to the NSW economy;
- To redevelop under-utilised land for beneficial economic use;
- To reduce the long-term environmental impacts from land-based container transport arising from the predicted growth in port trade, by increasing the proportion of containers transported by rail;
- To minimise the impact of the ILC on the surrounding environment and community; and
- To enhance the quality of the local environment by providing community and ecological benefits on the site.

Approvals Process

The proposed ILC is a Major Project, as defined in *State Environmental Planning Policy (Major Projects) 2005*, and is subject to assessment under the provisions of Part 3A of the *Environmental Planning and Assessment Act, 1979* (EP&A Act) and the *Environmental Planning and Assessment Regulation, 2000* (EP&A Regulation).



- RAIL RESERVATION
- EMPTY CONTAINER STORAGE
- INTERMODAL TERMINAL AREA
- LANDSCAPING MOUND AREA
- LANDSCAPING AREA
- COMMUNITY & ECOLOGICAL AREA
- WAREHOUSE AREA
- HERITAGE BUILDING
- LIGHT INDUSTRIAL/COMMERCIAL AREA
- ADMINISTRATION AREAS
- ROAD PAVEMENT AREA
- RAIL CORRIDOR INCLUDING SIDINGS
- 4.3 M LPG TANK
- DIESEL TANK

Figure 3
Concept Layout