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Health
South Western Sydney
Local Health District

Andrew Beattie
Infrastructure projects
Department of Planning & Environment
GPO Box 39
Sydney NSW 2000

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Dear Mr. Beattie,

State Significant Development SIMTA Stage 1 – Intermodal Terminal and Rail Connection Environmental Impact Statement (SSD-6766)

South Western Sydney Local Health District (SWSLHD) aims to protect and promote the health of the local population and recognises that many local and global factors affect health and illness. One of our strategic directions is to develop our capacity to work with other agencies to develop healthy environments.

Together with NSW Health, we have developed the NSW Healthy Urban Development Checklist as a guide for health services when commenting on development policies, plans and proposals. A pdf and an interactive copy of the Checklist can be found at: http://www.swslhd.nsw.gov.au/populationhealth/PH_environments/resources.html

SWSLHD has reviewed (1) the SIMTA Intermodal Terminal Facility Stage 1, Environmental Impact Statement (EIS), Part 4, Division 4.1, State Significant Development, dated May 2015 prepared by Hyder Consulting Pty Ltd and (2) the SIMTA Intermodal Terminal Facility – Stage 1 Screening Health Impact Assessment (HIA), Part 4, Division 4.1, State Significant Development, dated 25 April 2015 for the same project, prepared by Hyder Consulting, Job No: Tox-VC-001-07476.

The Site

The project site comprises approximately 83 hectares of land approximately 1,300 metres south of the intersection of Moorebank Avenue and the M5. Previous use was for the Defence National Storage and Distribution Centre, which has been relocated. Surrounding land uses include Defence and Commonwealth residual land, School of Military Engineering to the west, which is subject to a Development Assessment for Moorebank Intermodal Terminal (MIT) SSD-5066, Holsworthy Military Reserve to the south, and the Defence National Storage and Distribution Centre to the north and northeast.

Residential land is located in Moorebank in the northeast, Wattle Grove in the east, Casula in the west, Liverpool in the northwest, and Glenfield in the southwest.

Nearest residents are located at Wattle Grove – approximately 600 metres from the Stage 1 site to the east, and Casula – approximately 250 metres from the rail link to the west.

The proposed development to the east of Moorebank Avenue consists of an intermodal facility, warehouse and distribution facilities and freight village.

South Western Sydney Local Health District acknowledges the traditional owners of the land.

On the southern end of the site, a rail link to Southern Sydney Freight Line (SSFL) is proposed.

Stage 1 will provide the necessary infrastructure to support a container freight road volume of 250,000 twenty foot equivalent units per annum. The proposal is to operate 24 hours a day, 7 days a week. Key components will comprise truck processing, holding and loading areas, rail loading and container storage area and administration facilities with associated car parking, and a rail link.

This application seeks Approval for the Stage 1 of a three stage Development. Approvals have previously been granted for an Environmental Protection and Biodiversity Conservation Approval No. 2001/6229 in March 2014 and Concept Approval No. 10_0193 in September 2014.

A Health Impact Assessment investigated broad health impacts, and considered issues such as noise, disturbance, light, spill and other social impacts on the health of the community. SWSLHD recommends appropriate mitigation measures are in place to minimise any potential health risks or impacts of the terminal.

A quantitative Health Risk Assessment has been carried out to assess the potential health risks from exposure to air pollution and noise from the Stage 1 development.

Air Quality

It is estimated that there will be 670 truck movements per day through the facility, with approximately 52 movements per hour associated with the morning peak and 62 movements per hour associated with the evening peak. In addition, approximately 80 employee car movements are estimated per day. The proposal estimates approximately 10 train movements per day (i.e. 5 entering and 5 leaving the site).

An Air Quality Impact Assessment has been developed which provides a modelling scenario assessing potential emissions and their impacts from the operation of the SIMTA site including:

- Locomotives idling during container loading and unloading
- Trucks travelling along Moorebank Avenue and moving and idling within the project site
- Container handling equipment, and
- Forklifts.

The Air Quality Assessment (Environ, 2015) concluded that the regional impacts of the SIMTA Stage 1 proposal were negligible. However, the Health Risk Assessment for emissions from the operation of the Stage 1 Proposal has identified exposure to diesel particles and exposure to Nitrogen dioxide as carrying the highest risk to local residents.

Air quality assessment / health impact assessment comment

The quantitative health risk assessment presented within the Screening Health Impact Assessment is comprehensive and of high quality and uses methods that NSW Health supports. It demonstrates for a range of pollutants the incremental health impacts generated by traffic / trucks and onsite from the SIMTA development Stage 1 are low. While the health risk is considered to be low, the implementation of Best Practice Measures as outlined in s.22 and Appendix M of the EIS will reduce potential risk to the local community.

Noise

Noise modelling has identified receiver site #3 as having potential noise impact from operations at the SIMTA site when the facility is operating at an annual throughput of 1,000,000 TEU of up to 9dBA above the Industrial Noise Policy criteria.

It is noted that potential for wheel squeal (rail curve squeal) has been addressed. Mitigation measures and best practice management as outlined in s 9.4 and s 10.2, s 10.3, s22 and Appendix N of the EIS will minimise noise impact to the local community.

The report recommends that a Construction Noise and Vibration Management Plan and an Operational Noise and Vibration Management Plan will be prepared and implemented, which includes a Rail Noise Management Plan, to include monitoring and appropriate control measures to avoid, reduce and manage noise emissions and vibration. We endorse that recommendation.

Noise assessment comment

Methods to quantitatively assess the health impacts of noise are less well developed. The Noise and Vibration Impact Assessment outlines reasonably comprehensively the predicted noise impacts including incorporating an allowance/adjustment for wheel squeal. There are problems in assessing health impacts because of the different guideline standards that apply to the development site, road traffic noise, and non-network rail lines. In general, NSW Health would be most concerned with sleep disturbance. However, we also support (as the health impact assessment does) consideration of interference with cognitive tasks for children in affected classrooms. Train pass-by events are potentially sleep-disturbing. The guideline maximum allowed (LAmax) in the Rail Infrastructure Noise Guideline is high and we would expect awakenings to occur at a lower level. The findings of Screening Health Impact Assessment support this. We therefore would advocate as a condition of consent all feasible mitigation of the preferred southern rail link including lubrication and maintenance of rail and noise barriers to minimise affected receivers in the Casula and Glenfield areas. An Operational Noise and Vibration Management Plan may be an appropriate mechanism to monitor and achieve best health protective noise outcomes.

Cumulative Impacts

While it is recommended that the cumulative impacts of the SIMTA site and the Moorebank Intermodal Terminal are considered to be low, it is noted that the predicted air quality data were not available at the time of assessment for a proposed Glenfield Recycling Plant to be located at the Glenfield Waste Facility. While the EIS identifies that dust suppression techniques will be implemented during the construction and operation of the recycled facility, we have concerns about potential odours, which may add to the cumulative impact of fumes from diesel particles and Nitrogen dioxide from SIMTA and the Moorebank Intermodal Terminal.

It is recommended that consideration be given to the cumulative effects of all of the land use proposals likely to give rise to odours/fumes which may impact on the local community at future phases of development.

Measures as outlined in the Best Practice Reviews for air quality and noise should be implemented as feasible for this Proposal to reduce any cumulative air quality and noise impacts at Stage 1 of the SIMTA development.

We appreciate the opportunity to comment on the Environmental Impact Statement for SIMTA Stage 1 and are keen to continue to work in partnership to promote healthy environments for the residents of SWSLHD. If you would like to discuss this further, please feel free to contact Peter Sainsbury, Director Population Health on 8738 5718 or David Lawrence, Manager Planning on 8738 5755.

Yours sincerely

Amanda Larkin
Chief Executive

Date: 4/7/15