Trim Ref: SWD15/ 10194
Trim File: SWF11/511

NSW GOVERNMENT Health
South Western Sydney
Local Health District

Andrew Beattie
Infrastructure projects
Department of Planning & Environment
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Dear Mr. Beattie,

Moorebank Intermodal Terminal- response to revised Environmental Impact Study submissions (SSD-5066)

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 Environmental Impact Statement (EIS), Volume 9; dated October 2014 for the Moorebank Intermodal Terminal Project prepared by Parsons Brinckerhoff and (2) the Health Impact Assessment and Human Health Risk Assessment (HIA & HHRA) dated 21 April 2015 for the same project, prepared by Environmental Risk Sciences Pty Limited. These are revised documents after a previous exhibition incorporating changes based on submissions and further refinement of the terminal design including confirmation of the southern rail-link.

Previous correspondence dated 31 May 2010 to the NSW Department of Planning and Infrastructure from South West Sydney and Sydney Local Health Districts Public Health Unit recommended:

- further modelling of air quality
- further detailed assessment of noise
- further investigations in relation to light spillage, hazards and risk assessment
- further assessment of impacts of the development on the local community

The Site

The project site comprises approximately 220 hectares and is bounded by the Georges River in the West, Moorebank Avenue in the East, the M5 Motorway and ABB medium voltage facility in the North and East Hills Rail Line in the South. A second Intermodal Terminal facility, proposed by SIMTA, is currently also being considered immediately east of this project site and if both are approved both will operate simultaneously, 24 hours a day. Surrounding land use includes work sites, residences, schools, day care facilities and recreational areas.

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

The development will include the relocation of the School of Military Engineering and other Defence units to Holsworthy Barracks located southeast of the site and the remediation of approximately 5500m3 of contaminated soil currently present on the site.

The project will provide an inland road/rail terminal to service Sydney South and South West comprising an Import/Export (IMEX) International freight service and a domestic interstate/intrastate regional freight service. Loads will consist predominantly of containerised twenty foot equivalent units (TEU) (bulk cargo), some construction material and grain (cargo). Containers arriving on site are largely intact loads with unpacking taking place within or on the adjacent SIMTA site. The site comprises hardstand storage areas and warehousing facilities of up to 300,000 square metres for freight forwarders, logistic facilities and retail distribution centres.

Upon completion, the IMEX freight terminal will carry up to 1.05 million TEU/year and the interstate freight terminal will carry up to 500,000 TEU/year. During phases A, B and C, an estimated 965, 972 and 197 trucks respectively will enter and leave the project site each day.

It is noted in the HIA and HHRA that of the three (3) original options, the Southern Rail Access Option with rail access from the southwest corner of the IMT site, through Glenfield landfill, crossing the Georges River and floodplain is the preferred option.

Air Quality

The potential for Human Health Impact was partly assessed in Technical Paper 7 – Local Air Quality Impact Assessment (Volume 6). It was concluded that further investigation was required when it was shown that impact assessment criteria for fine particles could be exceeded. Further qualitative analysis was carried out in accordance with the Approved Methods for the Modelling and Assessments of Air Pollutants in NSW (DEC 2005a), the National Environmental Protection (Ambient Air Quality) Measure (NSPC 1998 and updates), the National Environmental Protection (Air Toxics) Measure (NEPC 2011) and relevant NSW SEARS and EIS Guidelines.

The monitoring results documented in the aforementioned Technical Paper were adopted as a baseline. Combustion emissions from diesel trucks and trains have been included in the dispersion modelling assessment. Fugitive emissions from plant and equipment and onsite storage of fuels and chemicals have also been included.

Appendix H Health Impact Assessment and Human Health Risk Assessment (HIA & HHRA) reveals that modelling of air quality in the surrounding community has been revised with minor variance from the EIS. The estimated concentration of Nitrogen Oxides, Sulphur Dioxide, Carbon Monoxide, Volatile Organic Compounds (VOCs) and Polycyclic Aromatic Hydrocarbons (PAHs) were considered to be lower than National and International guidelines.

Results show that exceedence of Particulate Matter (PM2.5) from cumulative concentrations generated at both the Moorebank and SIMTA sites was identified at a receiver location within the SIMTA development.

Best available technology and mitigation measures are to be implemented to minimise exposure in adjacent workplaces.

Slight odour may be detected on the project site from emissions caused from the removal of potentially contaminated soil. This is not expected to be an issue to off-site receivers.

Odours are to be managed though the implementation of Best Management Practice as discussed in s17.4.6 of the EIS. Additional mitigation measures as discussed in s17.4 are to be implemented.

Dust may be generated during construction phases and dust mitigation measures need to be carried out in accordance with s17.4. Dust is not considered to be an issue during operational phases due to large hard stand surface areas. However, dust generation is to be monitored and Best Management Practices are to be implemented at all times. An Air Quality Management Plan is to be developed and implemented for the operation of the project.

Comment on air quality assessment:

We note the quantitative risk assessment in Appendix H. This uses approaches that NSW Health supports – i.e. to quantitatively estimate the incremental additional impact of various pollutants on health outcomes. In relation to the assessment of cumulative impacts from the operation of both the Moorebank and SIMTA sites, the predicted health impacts are generally considered to be low (not significant); however there is the potential for risks in adjacent commercial/industrial areas to be at a level that are considered unacceptable. EnRisks suggests further mitigation measures need to be implemented to minimise exposure to particulates in the adjacent workplaces. This should be detailed further.

Noise

The HIA and HHRA advise that the preferred option of the Southern Rail Access and changes to the layout and operation of the IMT have resulted in a redistribution of noise and reduced noise impact to the previously identified residents identified in the EIS. However, it is noted that noise impacts above the noise management levels (NML) were identified at Casula, Wattle Grove, Glenfield and Liverpool during the construction phases.

Noise management measures will need to be implemented during the construction phases in accordance with s.12.4.1 of the EIS.

Night time noise criteria for the operation of the project, at sensitive receivers, are still predicted to exceed the NML by up to 5dBA. The HIA and HHRA s.3.3 recommends further noise mitigation measures to be utilised in addition to those outlined in the EIS.

Comment on noise assessment

There is potential for sleep disturbance from rail pass-by events. As detailed in the Revised Project Report for Noise and Vibration maximum levels at Casula and Glenfield would exceed the sleep disturbance objective for industrial premises. We note there is no separate allowance for wheel squeal. The report correctly indicates that sleep disturbance will depend on the frequency of events and the time of day/night. Appropriate mitigation measures should be considered. Advice should be sought from the Environment Protection Authority about appropriate mitigation but may include, track lubrication, effective maintenance regimes for locomotives and carriages, electrification, and low noise barriers. Consideration should be given to requiring noise monitoring and a Noise Management Plan as a condition of consent.

Traffic Congestion

The predicted health outcomes relating to traffic congestion should be positive as long as all the proposed mitigation measures are implemented.

Light Spillage

There is potential for light spill during the construction and operation phases. This may be increased by trains running at night, which have the potential to impact on Casula Residents. The EIS considers this risk to be low.

Hazardous Material

On site hazardous materials are to be limited to fuel for refuelling purposes and CO2 for fire fighting. The EIS considers there to be negligible risk of offsite impacts on the local community.

Human health risks and impacts-

Support Mitigation Measure 17A - As part of wider ongoing monitoring and evaluation processes, monitoring data for air quality, noise and traffic would be regularly reviewed against the guidelines developed in the specialist studies supporting this EIS, as they are based on protecting the health of the community. Should exceedances be identified in these key indicators as a result of the Project, then a further and more targeted monitoring and management program would be developed as required.

Grey water and black water recycling

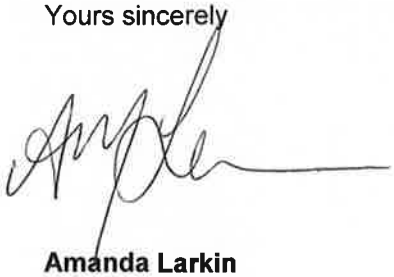
If the use of grey water and black water recycling is considered, it will need to comply with the relevant guidelines and agency approval. Recycling water would most likely be used for toilet flushing and/or landscape irrigation.

Revised Environmental Management measures

The revised Environmental Management measures outlined in chapter 9 and the mitigating measures are extensive. Many of these impact directly or indirectly on human health and are supported.

We appreciate the opportunity to comment on the Environmental Health Assessment for Moorebank Intermodal Terminal 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