Application number: SSD 5066/EPBC 2011/6086 Project name: Moorebank Intermodal Environmental Impact Statement **Objection to the Moorebank Intermodal Proposal** Name: Noel Clark Address: 9 Clarendon, Court Wattle Grove NSW 2173 Phone: 0424 821 997 Email: Compassforsale@optusnet.com.au Signature: I want my name released online with my submission: Yes No 🗖

I oppose the Moorebank Intermodal proposal for the following reasons:

# Better use of land

- The site identified for the Moorebank intermodal is the wrong location for such a facility. It is situated on prime, urban, riverfront land. This land should be used to assist the government in solving the housing crisis identified in the draft Metropolitan Strategy for Sydney, by using the development as a premium riverside residential lifestyle precinct. The land has the capacity to house 40,000 people.
- The land is situated less than 30 Kilometres from the Sydney CBD. It is in close proximity to public transport, including the T2 Airport and T2 Inner West & South lines (both of which have capacity to accommodate urban growth in this area), the Liverpool to Parramatta T-Way, the M90 Liverpool to Burwood bus route, and many suburban bus routes.
- The Auditor-General's report recently released shows a target of 800,000 TEUs to be moved to and from NSW Ports by rail in 2020. In a recent Sydney Morning Herald article, J Wiggins wrote that 'Asciano plan to invest \$112 million in their sites to increase capacity and making Chullora more competitive, able to handle an increased capacity from Port Botany, and open for operation before Moorebank'. With the Chullora intermodal capacity increased to 800,000 TEU it will easily be able to support increased in freight through Port Botany while the Badgerys Creek site is planned and constructed.

In a recent article in the Sydney Morning Herald it was learned that 'After more than a year of residents around Port Botany being told the night time noises they were complaining about did not exceed "sleep disturbance criteria", the Environment Protection Authority has admitted they were right.' (O'Brien, N., 2014, 'EPA admits it was mistaken about Port Botany noise levels', Sydney Morning Herald, 17 August 2014).

### Support from elected representatives

- The role of three tiers of government is to ensure that community needs can be voiced to the government by their local elected representatives. These representatives are based within the community, they understand the local area, and are acutely aware of the geographic typography of the area and their constituents needs.
- The representatives from the Liverpool area are all unequivocally stating that the Moorebank Intermodal proposal is in the wrong location. This includes the federal member for Hughes, Craig Kelly MP; the state member for Menai, Melanie Gibbons MP; and Liverpool City Mayor, Ned Mannoun.
- It is worth noting these representatives recognise the need for an intermodal terminal within metropolitan Sydney to support future freight growth in New South Wales; however, Badgerys Creek is the ultimate location for this development. Liverpool Council have recently released a discussion paper titled 'Badgerys Creek: the ideal location for an intermodal' (October 2014).
- It is time for the government to listen to their party members who are voicing some very valid concerns, and join the discussion about a new location for this project.

## **Improved Strategic Planning**

 The MIC state that an additional intermodal is required to reduce supply chain costs; however, it is questioned how the proposal at Moorebank will assist in reducing these costs. The proposed terminal in Moorebank will include transferring freight by rail less than 25 Kilometres from Port Botany, while increasing the handling costs of the supply chain with containers having to be loaded and unloaded multiple times in a very short distance. Infrastructure NSW has also questioned the viability of short haul freight and the funding of additional intermodal facilities until this has been properly investigated. That being the case, the increase in capacity at Chullora should be investigated with proper planning for a true intermodal at Badgerys Creek. Jenny Wiggins, in her Sydney Morning Herald article, states that Asciano is primed to invest \$112 million to 'compete "vigorously" with its own intermodal terminals', for example Chullora, and challenge the Moorebank intermodal essentially casting doubts over the economic viability of the Moorebank site (Wiggins, J., 2014, 'Asciano challenges Moorebank freight hub', Sydney Morning Herald, 2 July 2014).

 To truly reduce supply chain costs, the intermodal location should be moved to Badgerys Creek, a facility more than 40 Kilometres from the Port with access to key roads such as the M7 and the proposed M9. This location will also have the capacity to support future growth centres. The M9 motorway will provide 'a direct link between the Central Coast and the Illawarra, connecting the growth centres of Camden, Penrith and Windsor' (O'Rourke, J., 2014, 'What Sydney needs to transport us to the future', Daily Telegraph, 3 November 2014). An intermodal at Badgerys Creek demonstrates good strategic and growth planning.

#### Location

- The site is surrounded by residential development, this site should never have been selected due to the young families who have settled in this area;
- This area is a quiet, leafy suburb with strong community connections,
- This development will be detrimental to the area and depreciate its value; and
- The site is surrounded by residential and is river front land and objectively is more suitable for residential or commercial development. Analysis by Western Sydney Parklands "Market demand analysis has determined a shortage in business /retail floorspace within the region" Liverpool City Champion 5/11/2014 p4

- The site itself barely meets the current interstate rail freight requirements due to the length of the facility. This will prevent future efficiencies and improvements of interstate rail transport by limiting future train lengths.
- The Government has the opportunity to ensure the future health of residents, to ensure river front land is used to the best advantage for the community and the environment is maintained for future generations.
- Moorebank Intermodal Company claim that the majority of containers would be delivered within a radius of 20km from the terminal, a study carried out by a modelling firm on behalf of our community showed that two thirds of all containers from Port Botany are destined for the western suburbs not South Western Sydney which is between 26 to 35 km west of the proposed terminal.
- The Casula Powerhouse Arts and Entertainment Facility is important in the region.
   The noise issues due to the number of locomotives travelling past will prevent theatre and music productions from taking place.
- The developments are incompatible with Liverpool Council's vision for the Liverpool waterfront.
- The waterfront belongs to the community. Not a freight facility.
- The community has effectively been locked out of the river front due to 100 years of military occupation. It is time this prime land is returned to the people for their leisure and enjoyment. We don't want to be locked out of this land again.
- The site itself has no access to passenger rail, forcing Intermodal staff to drive to work which will exacerbate the traffic problems in the area.
- The site is a potential residential gold mine for the government either if it sells the land or it is sold to a developer.
  - It has four railway stations in walking distance. Giving potential residents the choice of two train lines –Airport line or Liverpool Line.
  - It is a short distance to Liverpool Hospital
  - o It is a short distance into Liverpool CBD

- o It is close to the Casula Powerhouse an arts/entertainment facility
- o An approved Mariner is located only 5 minutes down the River
- There is an existing sailing/ski club
- It is located on the banks of the Georges River.

#### Problems with the Moorebank proposal

The Moorebank site constrained by a number of issues:

- The area is already suffering from significant traffic congestion, the addition of an estimated 10,000 truck movements and approximately 5,000 passenger car movements per day will exacerbate this congestion.
- The Planning and Assessment Commission (PAC), following their community
  meeting on the SIMTA proposal, has identified that the Moorebank area is already
  suffering from significant traffic congestion. 'The community has strongly argued that
  the proposal is only going to move the congestion from Port Botany to the
  Liverpool/Campbelltown region. The Commission understands the Moorebank site is
  constrained by the surrounding residential and industrial land uses and the already
  heavily congested local and regional road network. If the concept plan were to be
  approved with the levels of throughput proposed by both SIMTA and MIC, then
  clearly the community's case is strengthened.' (2014, Planning and Assessment
  Commission, SIMTA assessment).
- The SIMTA Concept plan was approved by the PAC on the basis that they are limited to 250,000 TEU's, plus an additional 250,000 ONLY if the road network is able to handle the volume of heavy vehicle traffic. This being the determination made by the PAC, and in the absence of a master plan that would have enabled the commission to assess the impact of both proposals as part of the one process, this limit should apply to the operation of both SIMTA and Moorebank intermodal sites combined. TEU's should be limited to a total of 250,000 in this precinct.

- The economic viability of the site has been questioned due to the limits placed by the PAC on the number of TEUs SIMTA can move through their terminal. Chief Executive of Asciano has also questioned the economic viability of the site as previously mentioned, stating that Asciano plan to invest \$112 million in their sites to increase capacity and making Chullora more competitive, able to handle an increased capacity from Port Botany, and open for operation before Moorebank (Wiggins, J., 2014, 'Asciano challenges Moorebank freight hub', Sydney Morning Herald, 2 July 2014). With the Chullora intermodal capacity increased to 800,000 TEU it will easily be able to support increased in freight through Port Botany while the Badgerys Creek site is planned and constructed.
- The Moorebank site is surrounded by water on all sides. This means that the complex road and rail upgrades needed to service an intermodal in this area will be extremely costly. Liverpool Council has estimated these upgrades are likely to cost in excess of \$750 million.
- There are significant problems relating to air quality, construction and operational noise impacts created by the intermodals. A proposal of this size and nature should not be earmarked for a residential area.
- The PAC determination of the SIMTA proposal has already revealed that Particulate Matter 2.5 levels in the local area are close to or above the advisory criteria for this pollutant, this applies to the current background levels as well as the predicted impacts. Additional diesel and liquid natural gas powered vehicles in this area will exacerbate this problem.
- Noise impacts, light spill and air pollution will have a detrimental effect on the local community, some of whom live as close as 400 metres from the site. Residents around Port Botany living as far as three kilometres from the port are affected by these factors; many residents in Chifley for example have been very vocal about sleep disturbance in the online domain.

• The Moorebank site will have a detrimental impact on the Casula Powerhouse Arts Centre. The presence and accessibility of an art and cultural facility in a low socioeconomic area, such as Liverpool, is essential for positive community growth.

### Problems with the process

- The Freight Infrastructure Advisory Board (FIAB) recommended a master plan for the site, this was not undertaken.
- Residents agree the SIMTA and MIC proposals should have been considered as a single precinct application. This has created an unfair advantage for the proponents with confusion being created among the community with both proponents presenting different figures.
- The fact that both proposals were assessed separately also means that media attention highlighting the different stages of the planning and assessment process has also created confusion in the community.
- Coupled with this, the relocation of the Defence National Storage Distribution Centre (DNSDC) and the current construction works at Holsworthy Barracks have also exacerbated this confusion with many people within the community thinking the proposal is already in its construction phase.
- Liverpool Council, in meeting with PAC expressed disappointment that a master plan was not undertaken and confirms that this has created confusion within the community 'The ad hoc approach ......leaves gaps and inconsistencies in the information available resulting in a lack of transparency and reduced faith in government decision making.'
- A master plan would have reduced this confusion and allowed the community to better understand the impacts these proposals will have on their family, friends and neighbours. It would have allowed the community to better refute claims made by the proponents, and have a much greater grasp of any proposed mitigation strategies for this proposal.

- The MIC has also created confusion and doubt within the community, adding to a reduced faith in government process and decision making.
- They have done this first by splitting their figures. Rather than telling the community that there will be 1.55 million TEUs going through the site, they have split these figures between import-export and interstate. And rather than stating that there will be an estimated 297 train movements expected at the site, they have again split these figures to make them sound lower. The Liverpool Leader, in their article 'Intermodal company gives community \$1m for compensation package but concerned residents aren't buying it', reports on community concerns around the consultation process. This 'compensation package' will be completely inadequate to address the impacts this proposal will have on the area, and made MIC seem like it was trying to 'buy community support'. At the same time MIC also made a highly publicised donation to the Liverpool Mayoral Ball, which Liverpool Council subsequently rejected (Hansen, N., 2014, 'Liverpool Mayor knocks back \$5k ball donation from intermodal group but the cash is still destined for charity', Liverpool Leader, 22 August 2014).
- An intermodal at Badgerys Creek would not require this level of compensation, as it can be properly planned for a suitable area; it also has residential and council support.
- Second, the Sydney Morning Herald in their article 'Waterfront baron and Liberal Party donor scored inside running on freight hub tender' has highlighted a possible issue around transparency and due process in the awarding of tenders for the Moorebank precinct. In light of the recent ICAC investigations and the problems faced by the Newcastle community, transparency and due process are paramount in the government decision making process.

### **MICL and SIMTA Proposals**

- There has been a lot of confusion around the fact that two proposals have been proposed for one area (SIMTA and MICL).
- There is no whole-of- precinct plan.
- The cumulative impacts of the two proposals have not been adequately explained or addressed by the proposals; and
- There is confusion as to the total traffic generated from the two proposals, as the modelling for each is different.

### Badgerys Creek is a better plan

- The MIC, in their Environmental Impact Statement, attempt to describe why Moorebank has been selected as a location. However, Badgerys Creek is better suited to meet the criteria that the MIC has listed.
- Badgerys Creek is an ideal location for an intermodal terminal to handle both interstate and import-export freight. This is because it is:
  - long enough for interstate freight trains without the need for trains to be broken up and shunted, creating unnecessary additional noise in the area;
  - big enough to handle the number of container movements required up to
     1.1 million twenty foot Equivalent Units (TEUs) per year of import-export
     freight and another 500,000 TEUs per year of interstate freight. This is a
     greater capacity than the proposed Moorebank site;
  - o strategically located in an area where a new rail line is planned for the airport;
  - near the M7 Motorway, a link to the West and North West where it has been identified by Deloitte that most of the container freight will be headed, and accessible to the M5;
  - near the proposed M9 Motorway, providing the ability of the intermodal to service future growth centres;

- near the Western Sydney Employment Area (WSEA), future industrial areas and future freight markets in Western Sydney, where two-thirds of container freight received at Port Botany will be transported.
- further from Port Botany than the Moorebank site, making rail a viable alternative to trucks, and reducing supply chain costs;
- in development, meaning that truck access can be configured into the \$3.5
   billion already allocated to the surrounding road infrastructure network rather than upgrading roads that are already at capacity in the Moorebank precinct; and
- owned by the Australian Government and available for use consistent with the airport.
- Badgerys Creek is a greenfield site which has the space, presents the opportunity to further utilise the logistics networks required by an airport terminal and has the major advantage of having no surrounding houses.
- Co-location within the Badgerys Creek airport precinct is the most logical choice as it has the potential to deliver a true freight hub – linking rail, road and air freight networks.
- Money from the sale of the Moorebank site could fund the necessary infrastructure at Badgerys Creek.
- Badgerys Creek is further from the Sydney CBD and is cheaper land.
- The distance from Badgerys Creek to the container destinations as per the MICL plan is approximately the same distance Moorebank is to the destinations.

### Heritage

• We have a strong military history in this area and we are proud of our heritage. Removal of heritage features from the site will break ties for the community. • There are a number of aboriginal sites on the land.

# **Environmental Impacts**

- The unloading of imported containers in this area will have the potential to destroy native flora and fauna; and
- The unloading of imported containers in this area will have the potential to destroy the Georges River.
- The portion of the Georges River adjacent to the terminal is contained by Liverpool Weir, so pollution and run off will be trapped and could accumulate. There is a risk that the contamination levels could exceed those that occurred when there was a rubbish tip located under Liverpool Bridge adjacent to the Georges River.

# **Effect on Transport Infrastructure**

- The NSW Long Term Transport Master plan states there are significant challenges in using infrastructure that is shared between freight and passenger journey such as the current rail lines. This also supports a purpose built facility at Badgerys Creek to suit the future freight needs and targets of NSW.
- The T1 Western line was identified in the Auditor-General's report as a poor performer in on-time running, while the T2 Airport and T2 Inner West & South lines performed better in this area. This suggests that the Moorebank location would be better suited to residential development than to heavy industry.

## Increased Traffic

- The traffic congestion in the area, particularly on the M5 and Hume Highway, indicates that additional heavy vehicle movements in this area would be detrimental to the road network. The Planning and Assessment Commission have already recognised traffic congestion in the area as a significant factor. This is another reason to move the proposal to Badgerys Creek.
- The proposal will move the congestion from Port Botany to Moorebank, which is already congested;
- The modelling does not cater for the predicted growth of the region;

- Trucks 'weaving' onto and off the M5 between the Moorebank and Hume Highway interchanges will cause accidents and present a danger to me and my family; and
- Trucks parking and taking short cuts through the nearby streets will make the area unsafe for me, my family and friends.
- An additional 5,000 cars and 10,000 trucks per day will frequent the area congesting the roads and increasing the dangers on our local roads. The proposal will increase traffic delays.
- Travel times to the train stations and work will increase significantly, impacting on our standards of living.
- Increased travel times will impact on my work/life balance which will disrupt the amount of time I have to spend with my family.

### **Traffic and Transport**

- The MIC recognised that there are significant transport and traffic congestion
  problems in the Moorebank precinct; however, they claim that the additional 8,160
  heavy vehicles and 5,724 cars they predict to be brought into this precinct every day
  due to an intermodal will not have any further impact.
- The Chief Executive Officer of MIC stated that there would be approximately 1.6 trucks required per TEU. He also stated that 1,400,000 TEUs would be required to leave the terminal by truck. According to this statement, and given that heavy vehicles will have to both arrive and leave from the precinct, the figure of 8,160 heavy vehicles per day seems low, this actually equates to 12,376 heavy vehicles per day. For the purposes of this document the figure of 10,000 heavy vehicle movements per day has been chosen as a more accurate representation of the figures.
- The Chief Executive Officer of MIC also confirmed that the Moorebank intermodal will
  not take heavy vehicles off the M5 between Port Botany and Moorebank, and that as
  Port Botany expands the number of heavy vehicle movements on this stretch of the
  M5 is expected to grow. It should be noted that Labour Minister Anthony Albanese
  previously claimed that the Moorebank intermodal would take trucks off the M5; this

fallacy gained a lot of momentum especially in the media and it has never been publicly corrected.

 Questions were raised by the community about the problem of Trucks 'weaving' onto and off the M5 between the Moorebank and Hume Highway interchanges. MIC recognises this as a significant problem.

This 'weaving' has the potential to cause a recognised 'black spot', with potentially fatal consequences for the community. It is worth noting that a 'black spot' is already located at the Nuwarra Road and Heathcote Road intersection, only 2 Kilometres from the 'weave' site.

- The traffic modeller for MIC presented information about the predicted impacts on intersections both with the intermodal and without. Intersection surveys were undertaken on Tuesday 7 December 2010, and Tuesday 18 March 2014, in peak hours only. It is concerning that these surveys seem to only have been conducted on two days, four years apart, with the December date being in a peak holiday period.
- A Seven-day automatic traffic count was also conducted from Tuesday 7 December 2010 at only three locations along Moorebank Avenue. It is concerning that four year old data, gathered prior to a number of new and extensive residential developments in the area, is being used as a base for traffic modelling.
- The data presented by the traffic modeller showed a delay of over 200 seconds at some intersections when the intermodal is in operation. A 200 second delay, coupled with a 150-180 second cycle on a normal set of traffic lights is a significant impact (approximately six minutes at EACH set of lights), one that is likely to have flow on effects.

He has compared data, which is based on a scenario where the intermodal is operating with road and intersection upgrades, with predicted data based on no intermodal without road upgrades. This is not comparing like for like. Given that intersections in this area are currently operating at D or E classification (near or at capacity), it is hard to believe that the roads in the area will not be upgraded by

relevant authorities to attempt to reduce congestion before they reach an F classification.

 It has been noticed that traffic figures do not take into account the recently announced WestConnex which will have major traffic implications on the M5 during construction; this coincides with the proposed opening date of the Moorebank intermodal.

The WestConnex project also aims to increase Port Botany by 272% more container ships by catering for a greater number of heavy vehicle traffic movements on the M5. Labour Minister Anthony Albanese criticises the WestConnex 'proposal for not going near Port Botany, where it is expected there will be a large rise in the number of container trucks'. He also questions the government's transparency, citing that 'the decision to release new information about the impact of WestConnex on Melbourne Cup Day indicates to me that those who support this route are aware of its shortcomings and are keen to avoid public scrutiny.' (Saulwick, J., 2014, 'Albanese pans plans for the WestConnex', Sydney Morning Herald, 10 November 2014).

- Residents are understandably concerned about the impact of intermodal traffic on local and residential roads. The MIC confirmed at the community information session that while they can implement some measures for traffic movements, it will ultimately be up to the design of the precinct, the way the precinct operators choose to use the precinct, and choices made by heavy vehicle drivers as to which route they choose to use. With heavy congestion on Moorebank Avenue and the M5, two of the key roads in the area, it is likely that Anzac Road and Cambridge Avenue will be used as 'rat runs' for heavy vehicles.
- The MIC traffic modeller recognised that currently 6% of traffic on Anzac Road in the peak is heavy vehicle traffic; however he failed to include any heavy vehicle movements in his trip distribution figures for this road. In current heavy traffic conditions Anzac Road is a very attractive option, as demonstrated when the M5 is congested. Heavy traffic movements on a congested day are far higher than those

measured by MIC. The omission of this traffic flow information from MIC data sets is hard to fathom. For the local residents, especially those with houses that back onto Anzac Road, it creates uncertainty and distrust in the accuracy of the information presented.

- The construction of an intermodal terminal at Moorebank shows a lack of strategic planning, particularly in relation to future traffic movements.
- An intermodal at Badgerys Creek will be a true intermodal with road, rail and air access. This area will serve the purpose of meeting the needs of future growth centres. The government currently has the ability to configure appropriate and safe truck access in the Badgerys Creek area with \$3.5 billion in funding dedicated for road infrastructure.

#### Rail access

- MIC has predicted an additional 297 train movements each week, this figure does not include the interstate trains that may transit through the terminal.
- It was unclear how these train movements would impact residents in the area, due to three different rail entry options currently under consideration.
- Due to the length of trains, they will need to be broken up and shunted.
- MIC communicated that the actual rail entry will be decided once a tender for operation of the facility has been awarded. This makes it difficult for residents to understand the impacts of the rail access.
- It is unclear whether rail access will impact the passenger rail line and impact on travel times for people travelling by rail to the Sydney CBD.
- An intermodal at Badgerys Creek will not have the same rail implications. The size of the site will allow trains to remain whole within the terminal without the need for breaking and shunting.

# Air quality

- There will be increased diesel fumes in the community generated from locomotives, heavy vehicles and other heavy equipment used on site. These fumes are carcinogenic;
- My family, friends and myself will develop cancer or other health problems from the increased diesel fumes;
- South West Sydney is already heavily polluted due to the topography of the area;
- There will be dust and odour generated from this site, particularly during the construction period.
- South West Sydney is also known as the asthma and allergy belt of Sydney therefore the additional impact of poor air quality is unacceptable.
- The locomotives used for long haul freight work are old and add significantly to pollution.

### Noise

- There is no noise wall along the rail corridor along the Georges River, so noise will carry, particularly at night;
- There will be no way to mitigate noise from the unloading/loading and movement of containers within the terminal, especially for residents living within 400 metres of the site;
- There will be no way to mitigate noise from the breaking and shunting of trains which will need to happen on site;
- There will be wheel squeal due to the tight radius curves needed for trains to enter and exit the site; this will keep local residents awake at night; and
- Residents up to 3km from Port Botany are kept awake at night. I don't want this for my family.
- In a recent article in the Sydney Morning Herald it was learned that 'After more than a year of residents around Port Botany being told the night time noises they were

complaining about did not exceed "sleep disturbance criteria", the Environment Protection Authority has admitted they were right.' (O'Brien, N., 2014, 'EPA admits it was mistaken about Port Botany noise levels', Sydney Morning Herald, 17 August 2014).

#### Health

- The intermodal in this area will make me and my family sick; and
- I believe even one person having to use a puffer on one occasion as a result of this proposal is not acceptable.
- The government shouldn't plan industrial development in a residential area due to the health impacts of noise and emissions.
- According to the World Health organisation even relatively low noise levels are linked to higher rates of heart attack due to increased cortisol levels, increased levels of hypertension (blood pressure) and fatigue.
- In addition, increased noise levels are linked to higher rates of psychological issues such as depression, migraines and emotional stress.
- Evidence has shown that when children learn in noisier environments, they have a
  more difficult time understanding speech than those who learn in quieter settings.
  Noise also affects cognitive abilities, academic outcomes and later, vocational
  opportunities. There are a number of schools within close proximity to the proposed
  intermodal facilities.
- It is known that continuous noise in excess of 30 dB disturbs sleep. Sleep disturbances include difficulty falling asleep, frequent awakenings, waking too early, and alterations in sleep stages and depth, especially a reduction in REM sleep. Apart from various effects on sleep itself, noise during sleep causes increased blood pressure, increased heart rate, increased pulse amplitude, vasoconstriction, changes in respiration, cardiac arrhythmias, and increased body movement, The impacts of

this includes the increased likelihood of accidents and injuries due decreased concentration.

- "Other factors that influence the problem of night-time noise include its occurrence in residential areas with low background noise levels and combinations of noise and vibration such as produced by trains or heavy trucks. Low frequency sound is more disturbing, even at very low sound pressure levels; these low frequency components appear to have a significant detrimental effect on health." Goines, L., & Hagler, L. (n.d.). Noise Pollution: A Modern Plague. Southern Medical Journal, 287-294.
- The increased number of diesel trucks to the area (10,000 per day) is of great concern. The impact of diesel fumes on health is well documented.
   "The International Agency for Research on Cancer (IARC) is part of the World Health Organization (WHO). IARC classifies diesel engine exhaust as "carcinogenic to humans," based on sufficient evidence that it is linked to an increased risk of lung cancer, as well as limited evidence linking it to an increased risk of bladder cancer." In addition, diesel emissions are believed to play a role in other health problems, such as eye irritation, headache, asthma and other lung diseases, heart disease, and possibly immune system problems.
- Health issues present a future cost to the Government.

### Employment

- The local area has a jobs deficit, but is in particular need of professional jobs.
- Other land uses would provide more employment and higher quality employment than the proposals.
- A Business Park in this precinct would provide more local jobs than a freight facility which uses a lot of space but offers few jobs – especially professional jobs. In addition, moving jobs closer to the people will reduce traffic impacts in the area and provide better home work life balance for locals.

### Incompatibility with the local area

- MICL have stated at community information sessions that they used the same methodology to calculate the noise impact as they used in port Botany. Based on the recent findings in Port Botany, this approach is now proven to be flawed.
- Noise from the terminal will reduce resident's ability to use their outdoor living spaces
- Air pollutants from the diesel fumes will prevent residents being able to hang their laundry outside due to contamination and health risks.
- Freight terminals have crime issues which are not welcome in a strong residential community. Over the last few days the Police made the largest drugs bust to date at the Port Botany Freight Facility.

In short, the Moorebank location is perfectly positioned and adequately serviced by public transport to assist the government in meeting its housing targets set in the Metropolitan Strategy for Sydney. It is not the place for an Intermodal.