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Dear David

Unfortunately due to previous illness, I have had much "9-5 work" to catch up on this past week. As such I have not had the number of evenings needed to satisfactorily transform my visual / oral presentation into something that tracks well in written form only. I intend to complete this as it may have some utility later and because I hope to supply it to you and the Commission at a some point.

What I am supplying today is all the supplementary support or background work as foundation for my conclusion and recommendation below.

I will supply a follow up letter with an explainer note for all of the material supplied. For now I am merely sending the links for download:

<https://www.dropbox.com/sh/7in8m7ekm4v8xbr/AAB0muqA3Rr2aknvqWFS8AVta?dl=0>  
<https://www.dropbox.com/sh/8l4xhovl59ymk8i/AABNr-f5pn42dBBigrXArhYaa?dl=0>  
<https://www.dropbox.com/sh/dbnyl9le5cs23n9/AABIkicOI0t2A307RIBFjixja?dl=0>  
<https://www.dropbox.com/sh/ujz3o5ypawn2agx/AADxmJkjrHN1TJfezaBllf0a?dl=0>  
<https://www.dropbox.com/sh/7mr23k9nzkj5bp/AAD8h13lINXGY48oShet6W2na?dl=0>  
<https://www.dropbox.com/sh/swsrvof1jn6huzl/AADloRkUUnGcuWGOXfjOM-VSa?dl=0>  
<https://www.dropbox.com/sh/k42ooz1qjl2yt7f/AAAZm38Xwz7Ecl7JPXuRwWwha?dl=0>

This covers roughly 4+ years of dedicated work on a 10 year journey to buck the lazy and duplicitous slur of: nimby. It also represents an individual and group undertaking to do what the department and the process of "permissibility" has not achieved.

I / we / Raid Moorebank have truly assessed the merits of the project [and precinct]. We have considered the environmental, social and economic impacts of the project, all of the EIS documentation and all publicly available government documents. So as to fairly and accurately assess the site suitably and the public interest. It is on this basis and the foundation of the work supplied that I can firmly conclude the project is not suitable for this site, not in the public interest or the taxpayers interest and has exceedingly significant and negative impacts. All of which can be avoided and or better achieved at other locations.

Based in this assessment I / we / Raid Moorebank believe that this project is not approvable with any set of conditions.

This is primarily founded on the fact that neither MPE or MPW [via SIMTA and MICL back to Qube Logistics] has ever met the primary limits of consent. **Not once has the applicant or either the state of federal governments ever demonstrated that the project would not exceed / impede the local, regional and state transport network.** In point of fact if you read the material supplied by me and others; the applicants documentation proves the opposite is true. Moreover the NSW Government has nominated transport projects to Infrastructure Australia for the specific purpose of accommodating the moorebank intermodal project thus the state is tacitly admitting that the project will breach the limits of approval and should therefore disqualify the project at this location. My presentation was to walk through this step by step, so as to help everyone arrive this most obvious conclusion that has otherwise been buried in fog of 100,000s of pages and 10+ years of marketing.

The crucial issue is that **the applicant has not nor have either the state or federal governments ever applied the agreed transport methodology of 2011**. During the Sears + DGR phases it was determined that a mesoscopic and microsimulation methods would be necessary. This has been ignored and missing from every application, supplanted by a faulty methodology of looking at State Traffic Numbers and localised intersection counts. Essentially ignoring how that would interact or function **as and in the network**. During a previous round of Assessment and a PAC the independent Traffic Modeller for the Department [Aurecon] pointed this out in their 2015 report to the department. Aurecon recommended new combined full build modelling to be done by the applicant, the RMS and TfNSW and It is considered that this modeling must be completed as a matter of urgency and with maximum transparency, so that the Planning approvals process can progress effectively.

This has still not taken place. Instead the RMS and NSW Govt spent over \$3 Million on transport network modelling for Moorebank / Liverpool and is withholding from the Public, Liverpool City Council [and likely the IPCN] under the guise of "Commercial in Confidence" which to is my mind not a mistake of missing data but deliberate obfuscation and a proactive breach of the limits of consent. Moreover if the state or its agencies are a commercial participant, it can no longer [if ever] be an impartial judge of itself.

That is why it is so important that the Commissioners take this opportunity to put good planning and the public interest first; unlike the politically motivated state and federal governments. It is the fundamental missing link; the foundational evidence to satisfy limits of consent that generate the following recommendations:

1. Suspend all works and consent orders until such time as the much needed and overdue Transport Model can be conducted, released and reviewed by all parties including 2 blind peer reviews.
2. Rescind current twin SSD consents, and reject current twin modifications and advise the Minister and Qube Logistics to begin work on one single SSD application which incorporates all current and proposed conditions on the books. This would create clean simple and expedited project case. It should include a list of additional baseline studies for noise, air and water pollution based on revised transport modelling.

**This may seem severe to some. But I happen to think it is an abomination that 9+ years after this process / project began the pivotal Traffic Modelling still does not exist and that no government has conducted a genuine market driven merits assessment.**

Therefore I further ask you to recommend the NSW expedite a 3 port strategy and the ARTC's list of works to lift rail mode share and reduce Sydney's congestion in the short and long term. As elemental to this, to also recommend the NSW conduct a project / business case study of Moorebank vs Camelia vs Eastern Creek + Luddenham vs Maldon/Dombarton + Picton Intermodals. As well as a Cessnock Intermodal and possible Rail Corridors to up to Ballina, across to Dubbo / Parkes and south to Western Sydney. A study of co-locating road and standard or high speed commuter rail assets would also be advisable, as this would split the cost and impacts and value capture.

As a final aside to epitomise the failure of this project.

According to the Fed Govt Modelling [Parsons Brinkerhoff] there are 292 daily movements from Port Botany to Moorebank [2018] only 10% of the claimed 3000. Meanwhile the 1.6 million cubic metres of dirt coming from Westconnex will generate 1480 truck movements for a period of 2-3 years. This project's claim to fame has been that it will remove trucks off the M5 and reduce congestion for Sydney's Roads. Thus the severe irony or slap in the face is the project cannot shift trucks that don't exist meanwhile it will add 1000s into one of the most congested roads in Sydney - and that's just the construction phase.

failure | 'feɪljə | noun [mass noun]

1 lack of success: *an economic policy that is doomed to failure.*

• [count noun] an unsuccessful person or thing: *bad weather had resulted in crop failures.*

2 the neglect or omission of expected or required action: *their failure to comply with the basic rules.*

• [count noun] a lack or deficiency of a desirable quality: *a failure of imagination.*

3 the action or state of not functioning: *symptoms of heart failure* | [count noun] : *a chance engine failure.*

• [count noun] a sudden cessation of power: *a sudden power failure.*

• [count noun] the collapse of a business: *business failures rose by 53%.*

If you have any questions or the Commissioners have any questions I would be more than happy to answer.

Kind Regards

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