Preamble:

Note: The original SIMTA (Corrigan - 83 hectares) site is now known as Moorebank Precinct East (MPE) : the Moorebank Intermodal Company (MICL) (Albanese - 220 hectare) site is known as Moorebank Precinct West (MPW).

The whole development (MPE & MPW) delivery is now managed under SIMTA (Sydney Intermodal Terminal Alliance).

Position Statement:

The East Liverpool Progress Association supports the internodal development solely where it is approved singly as a fully integrated operation with a total 1.5 million TEU development with all traffic modelling released for public evaluation and with a specific costed solution to the dangerous M5 Georges River Bridge merge/weave operation. Public safety is paramount.

As the whole project is estimated to have \$9 billion (before costs - over 30 years) of national economic benefit then we must accept it in the public interest. But not where the development is constrained with lower TEU throughput.

Introduction:

The passage of Moorebank as the favoured site for the placement of a freight intermodal is a story unto itself. We lay it out chronologically with commentary in the table hereunder. There are many players in the saga. However the leading star, in terms of setting a path, is Mr. Chris Corrigan - veni, vidi, vici, literally. Mr. Corrigan's early observations from the (helicopter as reported) heavens are the sole basis for the development that is justified on the valuation of \$9 billion national economic benefit. - over 30 years. These observations are quoted ad nauseam to justify Moorebank as being the prime site for this major infrastructure development. They are: Commonwealth owned lands, expansive flat lands, M5 & M7 motorway access nearby, proximity to the Southern Sydney freight rail line.

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Yet there is a major flaw but the might of the proponents have seen Federal and State Government Public Service seemingly work to order. The various Planning Assessment Commissions have braved to approve Concept Plans with explicit and specific container throughput limits based on local roads capacity not being exceeded, as a Condition of consent. This constraint via Conditions was not revealed in the publicity material from Qube throughout its takeover play of Asciano in which the share value of Qube was quoted as a component, or the promoting of its Subordinated Debt Notes (2016). The business press revealed the Qube share price included the potential value of the Moorebank Intermodal running at its full 1.5 million TEU. There has been no mention of the initial 250,000 TEU limit. It and any future throughput levels up to 1.05 million TEU (IMEX) require evidence that the traffic from the Intermodal "will not exceed the capacity of the local transport systems.".

See the commentary in the TimeLine table below as to Mr. Corrigan's unobserved flaw; viz the constraints that cannot be overcome, if at all, without far far higher non-budgeted costs being generated for the project. These costs will be burdened more likely by the various governments or otherwise by Qube shareholders. **They have not been recognised in any published business case**. If BCs do exist then the question arises as to why there is an absence of any comparative site costings?

The response from SIMTA /MICL has been that the local intersections are at, or near to, failure conditions with ordinary growth and it is not caused by the freight terminal traffic. So, they claim, it is not their concern. Note that independent reviewers (Aurecon Oct 15 2015) of the NSW Department of Planning & Environment's report in favour of the project(s) state that the project is simply moving congestion from Port Botany to Moorebank and that the traffic modelling is far from adequate. These comments are in the body of their report but fail to rise in the Executive Summary. And nothing has been presented to counter this judgement from the Independent Reviewer of the Traffic Management for the project.

The largest component of all quoted economic benefit is the removal of traffic congestion. Is there a different economic cost per unit of traffic congestion in Sydney's west than that closer to the city? There seems to be no place to quote the cost of increasing congestion. It is simply ignored, with promised traffic congestion modelling held back from independent review.

Our Comments on the Commonwealth's 2012 Detailed Business Case : 2012 - heavily redacted.

- Lower TEU throughput flows through to lower revenue and a far diminished Benefit Cost Ratio quoted as 1:1.72
- The loan repayment to the Commonwealth for its \$380 million rail link construction and other works is reportedly based on a cost recovery basis, and not on TEU throughput thus signalling a higher fixed cost to the much diminished project.
- The project has, since 2015, attained "infrastructure" status, through a re-listing by Infrastructure Australia upon request from MICL, to attain Tax Loss Incentives ability to sell the loss and to keep the value of the loss over time.

It is a standing disgrace that any government would not challenge the absence of recognition by the proponents of the major traffic problems associated with local intersections. In the 600+ pages of the October / November 2016 Moorebank Precinct West EIS there is barely a word on the obvious and very dangerous merge / weave operations on the M5 Georges River Bridge less than a kilometre from the intermodal. **It is already a declared Traffic Black Spot**. It is the only path to/from the west for 13,000 extra daily traffic movements involving container Semi & B-Double trailers and rigid trucks. Any attempt to engineer a solution will involve either elevated roads access, bridge works or entire new road routes : all uncosted and excluded from the BCR analysis.

Other key points :

- SIMTA and MICL have claimed erroneously that the project is removing 3,000 container truck movements from Port Botany off the M5 motorway at Moorebank. This has been an off stated misrepresentation in reports and press releases. It is closer to 200.
- The site is a circumference site, not the ideal hub for distribution. This could be overlooked if there was free traffic flow.
- The site is too small. The recent EISs display evidence of squeezing in the infrastructure and activities of the intermodal:
 - The tight arc of the rail link route that causes loud wheel squeal. The southern loop is 160 metres where 500 metres is the minimum measure to avoid wheel squeal.

- Encroachments into river riparian areas for water retention ponds (MPW)
- The necessary re-routing of Moorebank Avenue towards residential housing
- The facing of warehouse loading towards the residential areas (MPE) thus removing the buffer effect.
- Interlink Roads submitted their opposition due to the intermodal traffic causing inefficiencies to the motorway.
- Most of the site is now to be elevated two metres, including Moorebank Avenue. This adds to the ugly overlaying of the Georges River Cumberland bush land with tar and cement.
- Raising the ground level places the lighting, plant and buildings 2 metres higher than the current limits, relative to the local residential neighbourhoods
- The MPW site has historical significance with its military presence and history. It is to be buried under 2 metres of fill and covered in tar and cement.
- The Georges River experiences major flood events. The change of these land levels upstream from actual and planned housing developments will affect the flood flows by preventing the natural cross ground flow of flood waters in the area.
- The two sites are subject to a hotchpotch of planning that lack integration to cause further costly inefficiency. SIMTA have progressed their original SIMTA development (MPE) in a bid to "hang on to what they have got". Notwithstanding the major "traffic cooridor" flaw, both SIMTA & MICL should wipe the slate clean and present to planning authorities a single integrated infrastructure development that delivers full efficiency. As mention in our opening, the East Liverpool Progress Association supports the intermodal development solely where it is approved singly as a total 1.5 million TEU development with all traffic modelling released for public evaluation and the M5 merge / weave specifically addressed and costed.

The Moorebank Intermodal as it stands is set to fail in delivering the national economic benefit used to justify its obvious adverse effects on the Georges River and the nearby established neighbourhoods and beyond.

This stands to be the classic example of the insider working for his interests, and others against it, with the public interest moved

aside and ignored. This is the very arrogance that gave birth to Brexit and Trump.

What to do?

- Governments to acknowledge the absence of urgency for a new Intermodal with greatly lessened freight demand against all forecasts over the last 10 years, and the extra capacity from the WesConnex road development in the short term.
- NSW Government : revoke all planning approvals.
- Federal Government revoke the funding commitments (\$380 million) and reserve it for negotiating an exit with Qube Holdings and funding of other site studies.
- Shut down the Moorebank Intermodal Company upon completion of the audit requested of its operations by the ELPA.
- Both Federal and NSW Governments negotiate with Qube Holdings to withdraw their plans for Moorebank.
- Initiate full evaluation of Eastern Creek and Badgerys Creek sites and build the Business Case with the exclusion all professional entities associated with the advancement of Moorebank.
- Include a complete review of freight infrastructure movement for Sydney and beyond, with all options including a rail link of a new Intermodal at Badgerys Creek and/or Eastern Creek with the Port of Newcastle via the far west spaces of Sydney as promoted by Mr. Greg Cameron.

What have we got - and how did we get it?

From here we provide a time line that exhibits people and events that have given rise to the Moorebank Intermodal. It being a product of government failure due to political entities playing the man, and ignoring the "what" and "how" of such major infrastructure investment.

Date	Event	Comment
1998	Battle of the Waterfront : Chris Corrigan (Patricks) v MUA	Images of dogs on leashes and strike breakers were prominent during the confrontations on the wharves via the national media. Corrigan succeeds and from that moment is held as a Hero for the Liberal / National Coalition and a Villain by Labor.
	Year 2000 Federal Gov is LNP State 0	Gov is Labor
2000	Patricks purchase a Vehicular and small freight Intermodal - Ingleburn .	The site is situated within an established industrial area with an existing rail link.
2001	Patricks apply for planning approval to expand the site and operations. It comes up against local Labor blocking plays. With SIMTA this continues for another 12 years.	Local ALP controlled Campbelltown Council rejects the application. Craig Knowles is the local MP and at the time a Minister in the State Government.

Date	Event	Comment
Pre- 2003 Mr. Corrigan's	Mr Corrigan flies over, reportedly in his recreational helicopter and observes Moorebank as flat ground, Commonwealth owned, and adjacent to the M5/M7	Mr. Corrigan's observation became the most quoted justification for Moorebank as the Internodal site.
compounding error begins.	Motorway and the soon to be built : SSFL This has been the catch cry of the distant public servant overlords ever since .	The other prominent justification is that "many Government and industry studies have recommended Moorebank to be the most suitable location for the intermodal. "
	 Mr. Corrigan begins the compounding error that will render the Moorebank Intermodal an infrastructure failure. Its projected Benefit Cost Ratio of 1 : 1.72 cannot be attained due to far reduced container throughput or far higher costs or failure to reduce traffic congestion. We project its destiny to be another small pocket intermodal servicing Qube's extensive warehousing operations. It is noted that the costs of the Commonwealth's \$380 million to construct the Rail Link is to be repaid on a "cost recovery" basis and not on TEU throughput. 	Corrigan failed to notice that East Liverpool is the sole traffic corridor for the entire south west region of Sydney for east-west / west-east traffic. It is bounded by the Georges River on three sides, and therefore bridge reliant. The nearby M5 Georges River Bridge and Liverpool Bridge carry almost as many vehicle movements as the Sydney Harbour Bridge and Tunnel combined.
2003	Criag Knowles is Minister for Planning - He gives partial approval to the Patricks Ingleburn development.	Knowles was reported as causing a long unjustified delay from his Ministerial Office.
	Patricks appeal to the Land & Environment Court.	Ref: SMH: "After a shunt or three, off the rails" September 28, 2004 - writes Elizabeth Farrelly.

Date	Event	Comment
February 2003	 Westpac Funds Management purchases the 83 hectare Defence DNSDC lands for \$190 million : "considered ripe for redevelopment as an industrial or residential complex" - The Age 3rd April 2003. It is not known whether there was opportunity for a competitive tender associated with the sale. 	I In 2007 Stocklands joined with Kaplan (Corrigan associated) & QR National to purchase the property : I The property was leased back to Defence with options for lease renewal to 2023.
2004	Bruce Baird MP takes the idea of Moorebank to the Howard Government	Hansard
2004	Building our National Transport Future - Howard's 2004 Election Policy "The Coalition Government has identified defence land at Moorebank as surplus to future needs, which will be considered for an intermodal freight terminal as a critical part of the AusLink land transport plan"	Observation: From "fly over" to Liberal Party Policy Article in The Australian " the Moorebank project has its roots in Corrigan's obsession with the potential of a strategic piece of federal government land"
Sept 2004	Federal Liberal Gov Minister John Anderson announces Moorebank to be a site for an Intermodal.	
Feb 2005	Craig Knowles establishes the Freight Industry Advisory Board with task to advise on rail operations for freight from Port Botany	Chairman was Laurie Brereton : an ALP Stalwart ALP to the core.
July 2005	Craig Knowles as Minister for Infrastructure & Planning NSW receives the report : Railing Port Botany's Containers Explicitly recommending Moorebank.	Mr. Knowles' NSW Seat was across the river from MIFT - He should have known of the severe constraints of the site due to East Liverpool / Moorebank being

Date Comment Event bound on three points of the compass by the Georges River and therefore totally bridge reliant. It is understood that FIAB produced no other project. The FIAB Report was released in October 2005. It It serves as the sole traffic corridor to the east for an locates the Moorebank Intermodal across the entire entire region of Sydney. He was in fact the Planning Moorebank Steele Barracks / School of Military Minister. Engineering lands which are adjacent to the DNSDC (SIMTA) site. The Railing Port Botany's Containers report is guoted extensively across succeeding years in EIS's and supporting articles including announcements by Albanese MP of the ALP Federal Gov's decision to develop Moorebank. This took 4 years : Corrigan ridicules Knowles in the 3 Aug 2005 NSW Land & Environment Court rules in favour of Press. He states (Rail Express Aug 3 2005) :"We are pleased that the court noted that our proposal Patricks expansion of their Ingleburn intermodal site. supports [the] Government's logistics and environmental policy, despite the (ALP) Government's own attempts to block the project." As the Court said there was no basis for the Government's decision : Mr. Corrigan read it as a blocking operation. Corrigan / Qube were to meet much more ALP obstruction when the ALP takes Federal Government in 2007

Date	Event	Comment
3 Aug 2005	Mr. Knowles announces his imminent retirement from Parliament. He retired to the Southern Highlands - far from Moorebank. According to the entry in Wikimedia Mr. Knowles "became a consultant and political lobbyist"	The judgement was unrelated to Knowles' resigning from the Ministry. On the same day Bob Carr stood down as Premier to retire. Knowles announced his retirement from Parliament a few days later. He left a mess for former constituents.
Aug to 2005 - May 2006	 Toll Holdings make a hostile takeover of Patricks (headed by Corrigan). Patricks is removed from the ASX. Toll later demerge Patricks into a new company Asciano. In 2015-16 Asciano succumb to a hostile takeover by Qube Holdings et al : thus Corrigan's Qube Holdings become a 50% joint venture partner in Patricks. 	Corrigan lost his listed Company. He engages as a partner in Kaplan Partners which owns Kaplan Funds Management. This vehicle will eventually purchase DP World' P&O assets and hold \$445 million of logistics works. KFM Diversified Infrastructure and Logistics Fund becomes Qube Logistics on 1st June 2010. Corrigan is reported as calling it "junior Patricks" as it employs most of Corrigan / Patrick management team before the Toll Holdings takeover. Qube Logistics is fully corporatised in August 2011. It is listed on ASX to eventually become the current ASX listed Qube Holdings Limited.
October 2	October 2007 New Federal Government Federal Gov is Labor State Gov is Labor	
Dec 2007	SIMTA formed to purchase the 83 hectare DNSDC Defence land at Moorebank. SIMTA : Sydney Intermodal Terminal Alliance	83 Hectare SIMTA : Stockland 60% : Kaplan Funds Management (Corrigan as a Director) 30% and QR National 10% Corrigan is well in the game but with the presence now of an ALP Federal Government.

Date	Event	Comment
Dec 2008	ALP Fed Minister for Infrastructure Albanese gives direction to the Infrastructure Australia Coordinator "to facilitate development of an intermodal terminal at Moorebank"	Through 2008 - 2013 there was a flurry of lobbying from business leaders for there to be a single development at Moorebank. The ALP Government refused and worked against the Corrigan interests.
May 2009	IA "identify" Moorebank Intermodal precinct as part of its Priority Pipeline.	Hansard: IA stated the project should be a project developed and operated through private enterprise investment. There is no comparative analysis of the other sites;.
Nov 2009	Infrastructure Australia's Michael Deegan addresses a conference hosted by Chartered Institute of Logistics and Transport in Australia [CILTA], in Campbelltown. He makes a presentation ."the Moorebank Future Development Vision"	Source: NSW Legislative Assembly Hansard – 01 December 2009 - Megarrity MP The "Why Moorebank" slide repeated the Corrigan helicopter observations.
Budget 2010-11	The 2010-11 Federal Budget has a \$70 million item to cover the development of the Business Case and other study works for the Albaneese / Wong Moorebank Intermodal	A Detailed Business Case was produced but remained heavily Redacted for public viewing.
Sept 2010	The Labor Government acts. It takes the initiative from Infrastructure Australia and sets up the Moorebank Project Office with a \$300 million allocation from the Nation Building Program to begin the planning a IMT on Military (SME) lands across the road from the SIMTA / Corrigan development	In September 2010, the Commonwealth Department of Finance (DoF) commenced the Moorebank Intermodal Terminal Feasibility Study (the Feasibility Study). The Moorebank Project Office (MPO) was established to conduct the Feasibility Study, with input from a team of advisers. The Feasibility Study

Date	Event	Comment
		included economic and financial analysis, technical
		feasibility and master planning for the facility.
		Later Hansard records relate that there was no
		business case of comparative sites such as Eastern
		Creek which also received recommendation
2010 - 2012	Minister Albanese and the Government consistently reject the requests by SIMTA for access to the Commonwealth lands to build the required Rail Link	Copies of redacted emails and correspondence display the activity of public servants operating under instruction, but exhibiting a lot of initiative of their own, in denying SIMTA access by refusing owner's consent.
14th March 2012	March 2011 -Federal Gov is Labor:CharacterityQube announce their purchase for \$123 million of	ange to LNP as State Gov QUBE CEO: "we believe stage 1 of the project could
	Stockland's holding in the Moorebank Industrial	commence operations to Port Botany by 2014. The
	Property Trust. It takes Qube's stake to 67% of	billion dollar project will be fully funded by the private
	ownership with QR National holding the balance	sector."
23rd April 2012	Ministers Albanese and Wong announce the	
·	Governments decision to develop the Moorebank	
	Intermodal on the west side of Moorebank Avenue.	Access is still denied to SIMTA for the rail link.
		Deputations by the NSW Premier and Planning
	Note: A question worth pursuing:	Ministers and major business lobby groups fail to have Commonwealth support the SIMTA project.
	Why did the Commonwealth adopt the	
	pro-Moorebank position as a starting position?	This would have been more beneficial to the nation than the blocking strategy adopted by Labor.

Date	Event	Comment
	The LNP backed Mr. Corrigan' original observations, flawed as they were. The Senate Hansard reveal that the Labor / Albanese decision was not preceded by any serious re-evaluation of Moorebank. They seemed to have run off the unstudied basis of the Corrigan "obsession" < as reported. There was no studied evaluation of other locations nor of Moorebank through which process its severe traffic, and other, constraints would have become apparent. The FIAB report listed Eastern Creek as "the preferred site for a future intermodal terminal" ; i.e. After the favoured Moorebank site.	The original July 2005 FIAB Railing Port Botany Containers report is quoted in all Moorebank project justifications. This report was initiated by Minister Knowles - at the time he was in battle with Corrigan in the NSW Land & Environment Court - after private interests had bought into Moorebank : the SIMTA site. (Refer Feb 2003 entry) FIAB specified the 220 hectares of remaining military lands adjacent to SIMTA for separate development.
Reference To May 2012 and 2014 Hansard	We refer the reader to the our supporting document Supporting Document to East Liverpool Progress Association Submission on MP 10_0193 MOD2 : SSD 5066 MOD1 : SSD 7628. It is sub section of an earlier narrative version of this time line based submission. It contains Senate Estimates Hansard references from May 2012 (Labor Gov) and May 2014 (LNP Gov) that are very revealing as to the hardened attitude of Labor towards Mr. Corrigan, and of the LNP seeking more transparency on the suspected blocking play of Labor with regard MPW.	These exchanges exhibit the corruption of processes. The flaws that we have identified could have been argued in the parliamentary processes to underpin an objective evaluation.

Date	Event	Comment
Oct 2012	More frustration for Corrigan / SIMTAInformed that Defence renew a 5 year lease until March 2018 on its DNSDC plant situated on the SIMTA site	Qube comment : " refusal is intended to frustrate delivery of the SIMTA Intermodal project" An FOI request followed
11 Oct 2012	FOI request - presumably from SIMTA - covering the decision making processes - inputs from agencies and meeting minutes - that saw SIMTA access to Commonwealth lands for the rail Link, and involving the extension of the DOD tenancy to 2018 Response letter dated: 4th Jan 2013	FOI response doc is in hand but addressee redacted. Associated document s appear on the DOD site as published FOI docs - heavily redacted but still informative of the collaborative exercise to refuse SIMTA requests.
	At some time after the election of the Liberal / National Party Coalition Defence terminated their	deral Gov is LNP State Gov is LNP A cooperative Government is now in power.
June 2015	tenancy of the DNSDC site. MIC entered an agreement with Sydney Intermodal Terminal Alliance development (SIMTA) under which SIMTA will build and operate an intermodal freight precinct at Moorebank. MIC will oversee development of the Moorebank freight precinct to make sure SIMTA delivers the core components of the precinct infrastructure to the required standards.	SIMTA will build and operate. In the meantime they are pursuing planning approvals based on two separate developments that adjoin east and west of Moorebank Avenue.
	During operations, MIC's main role will be to monitor SIMTA's compliance with its obligation to provide access to the IMEX and interstate terminals on an open and non-discriminatory basis.	

Date	Event	Comment	
The Hotchpotch of Planning Assessments and Approvals Begin The period 2010-13 saw the deliberate blocking of Mr. Corrigan's interests by the Federal Labor Government while establishing an alternative competing development on lands opposite the SIMTA lands and with direct access to the SSFL across the Georges River.			
	As at 24th February 2017 there are still two non integrated development proposals before the planning authorities sharing an agreed rail link to be funded by the Commonwealth (\$380 million).		
	ments have a common boundary : Moorebank Avenue. gned to the buffer zone to the nearby residential neighb		
This great deficiency in planning is the consequence of Qube taking a strategy of "hanging on to what we have got" - which is an approval for 250,000 TEU IMEX. This is a further indictment of the paucity of negations and oversight by government authorities. Yet we need to view it in the light of the decade long abuse of Mr. Corrigan's interests in the region by Labor Governments.			
We know it to be unlikely, but if there is to be a final, financially responsible solution proposed and accepted to remedy the heightened congestion and danger at the M5 Georges River Bridge weave/merge operations then the whole development should be suspended and a single, fully integrated intermodal development application be produced for a new planning approval cycle. This current planning hotchpotch is delivering sub standard planning to an already greatly flawed project.			
This IMT development is destined to be another pocket terminal.			
Hereunder are the major Planning Approvals that apply to Moorebank.			

Date	Event	Comment
MPE MP 10-1093	SIMTA Concept Plan application From March 2012 to September 2014 Note: Dates are generally given to provide the time scale of each approval.	IMEX 1,000,000 TEU Applied for : NOTE: 250,000 TEU throughput approved.
MPW SSD-5066	MIC Concept Plan application From Feb 2012 to June 2016 Includes Stage 1 - Early Works Final Development Consent given 20th Feb 2017 The ELPA are querying the satisfaction of Schedule 2 Terms of Approval - Limit of Approvals 8(a) and (6) in this decision.	IMEX 1,000,000 TEU Applied for : Limit to 250,000 TEU approved but only if satisfied that traffic will not exceed the capacity of the local road transport system.
MPE Stage 1 SSD 14-6766	IMEX operations December 2014 to December 2016	250,000 TEU throughput applied and attained.
MPW Stage 2 SSD 16-7709	IMEX operations and warehousing. July 2016 - Review of Submissions underway	Seeking TEU throughput of 500,000.
MPE Stage 2 SSD 7628	Warehousing- 300,000 m2 GFA to service MPE Stage 1 May 2016 - On Exhibition	

Date	Event	Comment
Plan Modiifications	MP 10_1093 Mod 2 and SSD 5066 Mod 1 December 2016 - On Exhibition They include raising much of the lands by 2 metres with the importation of over 2.2 million m3 of fill.	These modification display the hotchpotch of the planning. While SIMTA / Qube are holding on to their original Planning Approvals (MPE Concept & MPE Stage 1) there seems to be an endeavour to align the MPW project to it via the modifications.
End of Time Line		