

OBJECTION: MPW Concept & Stage 2 Modifications

14.09.2020

This submission is to be considered as an objection to both the modification application for Moorebank Intermodal Precinct West Concept Plan and Stage 1 (SSD-5066-Mod-2) and modification application for Moorebank Intermodal Precinct West Stage 2 (SSD-7709-Mod-1).

SUMMARY STATEMENT

The Environment Planning and Assessment Act 1979 - s4.15 (cf previous s 79C) states:

(1) **Matters for consideration** — general

In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application—

(a) *the provisions of—*

- (i) *any environmental planning instrument, and*
- (ii) *any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and*
- (iii) *any development control plan, and*
- (iiia) *any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and*
- (iv) *the regulations (to the extent that they prescribe matters for the purposes of this paragraph),*

(b) **the likely impacts of that development**, including **environmental impacts** on both the **natural** and **built environments**, and **social and economic impacts in the locality**,

(c) **the suitability of the site for the development**,

(d) *any submissions made in accordance with this Act or the regulations,*

(e) **the public interest**.



Put simply, or put in layman's terms:

Good Public Planning is not to be measured by private profit motivations; and it is not to be assessed solely on what may or may not be legally permissible or legally altered after the fact. NO. Good Public Planning is instead defined by suitability to a locality and based on the net environmental, social and economic impacts to those most affected. More importantly good Public Planning must have strategic value to the Public Good, by responding to the moral and ethical duty the state has for its current and future citizens. That is Us, our families and their healthy, safe and prosperous futures.

A thorough reading of the materials presented by the proponent, in this application, read as follows. *'We want this, and because we want it, you must give it – and by the way – we've added in our own legal advice, so the department best be complicit, and the community best be compliant'.*

Frankly – ‘ because we want it ’ – is just not a good enough reason.

A review of publicly available environmental planning instruments; the development control plan; the regulations; the existing conditions of consent; and the impacts of the development, the subject of these applications, classify them as irrefutably not suitable to this site and are not in the public interest. Thorough reading of the relevant material identifies that the local social and economic disbenefits are too great and the human, natural and built environments will suffer illogical, preventable and perhaps illegal negative impacts. In particular the proposed development is not fit for purpose and contravenes the conditions of consent. There are extra consequentially adverse impacts to Transport and Traffic access, Air Quality and Noise Pollution across the entire site and region. These being on top of the identified negative impacts of Height of Buildings [HOB], Noise + Light Pollution, Visual Amenity and Dangerous Goods.

On this basis, both modification applications, must be flatly refused consent by the Department.

RAIDM INC's position has always been and continues to be that the intermodal(s) represent the wrong project in the wrong place, at the wrong time and that the entire 300ha (still has tremendous) potential for integrated land use planning for much needed jobs, homes and public transport on our riverfront.