



Objection to Moorebank Intermodal Stage 3

SSD 10431

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On behalf of: The George's River Environmental Alliance.

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The George's River Environmental Alliance(GREA) is a network of groups and individuals with an interest in environmental quality and liveability in the George's River catchment.

We Object to this proposal for a compound worker accommodation, car parking hardstand, road construction, drainage the importation of 280,000 unconsolidated and 540,000 structural fill, the subdivision and creation of nine allotments for terminal and warehousing purposes.

Here are the reasons for our objections.

Consultation

The Environmental Impact Statement (Executive Summary ES.p. 4) refers to a Community Communication Strategy in place for the MPE Site and MPW Site (SSD 7709) which is established, and refers to the Community Consultative Committee. I am a community representative on that committee and dispute the assertion that we have been in any substantive manner "notified throughout the course of the application". The Agenda and Minutes record of those meetings does not reveal any ongoing substantive discussions within the context of a Stage 3 App[roval].

No additional impacts to the biophysical environmental and social values beyond those already assessed (ES. p.5)

GREA objected strenuously to the approval of MPW2, particularly to the wholesale destruction of endangered ecological forest communities and the lack of a naturalistic treatment of urban stormwater, according to WSUD principles, across the site and particularly at its interface with the highly fragile and erodible Georges River riverbanks. We also object to the massive, and possibly increased volumes of fill proposed. As work has proceeded according to the MPW2 consent, our concerns have been heightened.

Every new approval provides an opportunity for an evaluation and re-set. The events of 2020 have prompted a greater awareness of the impacts of climate change. A concern for bushfire effects, has had a spill-over effect, leading to greater concerns about air quality and the removal of tree canopy in contributing to the heat island effect. An excellent study is now available, authored by the University of Western Sydney, for Campbelltown City Council, arguing the vulnerability of parts of Campbelltown to temperatures in excess of 50 degrees Celsius in the future.

(<https://researchdirect.westernsydney.edu.au/islandora/object/uws:52978>)

The huge areas of hardstand and hard rooves planned on this site at Moorebank offer the same risks. This issue has not been considered. Furthermore the Covid-19 crisis has shown how important it is for residents and workers to escape to the outdoors, to have safe outdoor areas of high amenity at workplaces as refuges. So it is essential that the lot sub-divisions have large areas earmarked at this early stage for substantial, integrated landscaped areas to be planted, and wherever possible, the retention of any existing stands of mature trees is required, as a heat and amenity ameliorating management strategy. The site must now be designed to create cooler micro-climates, not vast, bare heat producing concrete deserts. Visually too this is an important consideration, as this development will be within the viewsheds of both the Casula Powerhouse and the increasingly tall buildings of the Liverpool CBD. This must be reflected in any subsequent approvals on this site.

Contamination issues are outstanding and unresolved and so therefore must prevent the importation of fill and any consequent construction.

As a member of the Community Consultative Committee, I firstly became aware of the presence of PFAS being collected as a result of surface works when on a site inspection. Soon after it was confirmed by Elton Consultants for SIMTA, that 11 ponds were being treated for PFAS contamination. That process is ongoing. I have on behalf of GREa, been in correspondence with both the EPA and the Compliance officers within DPIE. There is no transparency around the manner in which PFAS is being managed on the site, the community has no access to the Independent Auditor report on this matter, nor has there been any revealing of the Groundwater Remediation Action Plan or Long term Environmental Management Plan, as is required by the conditions of consent for MPW Stage 2. We are also concerned that this approval should reflect the findings of the Federal government's investigation of the PFAS contamination on Military lands, as this site remains leased from the Commonwealth and was used for defence purposes, that involved PFAS contamination.

We believe that there could be a PFAS groundwater plume moving towards the Georges River, and this is highly unacceptable. We object to the massive emplacement of fill over the site, as burying the PFAS is not managing it. Once concreted and built over, that PFAS becomes out sight, but not necessarily environmental safe. It may not any longer be, brought to the surface for treatment, but rather ominously moving through groundwater to spoil the receiving waters of the Georges River.

So our recommendation is for a non approval, until it is proved this is not occurring.

27/5/20

Sharyn Cullis

