



Office of  
Environment  
& Heritage

DOC16/338214  
SSD 5066 MOD 1

Mr Andrew Beattie  
Infrastructure Assessments  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr Beattie

**Modification to Moorebank Intermodal Terminal Stage 1 SSD 5066 MOD 1**

I refer to your letter received 7 July 2016, seeking comments from the Office of Environment and Heritage (OEH) in regard to a request to modify the approval of Moorebank Intermodal Terminal Stage 1 (Early Works) at Moorebank Avenue, Moorebank.

OEH has reviewed the documentation provided and provides comments on biodiversity and floodplain risk management at Attachment 1.

If you have any further questions, please contact Marnie Stewart, Senior Operations Officer on 9995 6868 or at [marnie.stewart@environment.nsw.gov.au](mailto:marnie.stewart@environment.nsw.gov.au).

Yours sincerely

*S. Harrison 19/08/16*

**SUSAN HARRISON**  
**Regional Team Leader Planning**  
**Regional Operations**

Contact officer: MARNIE STEWART  
9995 6868

## **ATTACHMENT 1**

### **OEH comments on Modification to Moorebank Intermodal Terminal Stage 1 SSD 5066 MOD 1**

#### **1. Floodplain Risk Management**

The subject modification proposal outlines a significant variation in the scope of work in relation to the filling of the site with 1,600,000 m<sup>3</sup> of imported material and proposed cut and fill operations.

OEH's review of the relevant reports has revealed that from a floodplain risk management perspective the documents do not provide sufficient information to clearly demonstrate:

- the impacts, if any, of the modified project on the full range of flooding from the Georges River, Anzac Creek or overland flooding,
- proposed floodplain risk management measures to mitigate or eliminate the risk from flooding,
- a revision of the cumulative impacts upstream and downstream of the proposed works, and
- a revision of the climate change impacts as a result of the modified works.

It is therefore recommended that a revised flood assessment is undertaken to assess the modified proposal.

#### **2. Biodiversity**

OEH notes that the Stormwater Assessment (Appendix D) indicates that the site levels will be raised by up to 10 metres and that some of the extant vegetation to be conserved is immediately adjacent to the 'area of impact (modification subject)'. Of note is that three of the vegetation types that are to be conserved on site (Alluvial Woodland, Riparian Forest, Castlereagh Swamp Woodland), all of which are endangered ecological communities, are vegetation communities that occur on floodplains and river-flats. As such, they are particularly susceptible to alterations in drainage patterns, sedimentation, and changes to groundwater levels. The Concept Plan Modification report acknowledges that the proposed modification would "result in an intensification of erosion and sedimentation impacts previously identified for Early Works", most notably including:

- changes to groundwater levels and systems,
- changes to volume and velocities of surface water drainage, and
- sedimentation of creeks and drainage lines.

The Biodiversity Impact Assessment however, does not include a discussion of the proposed alterations to surface levels and the impacts of this on native vegetation and it not clear what impact the importation of large quantities of fill will have on the vegetation. OEH recommends that the Biodiversity Impact Assessment be revised to address this issue.