

Attention DPIE, Major Projects Assessment, <https://www.planningportal.nsw.gov.au/major-projects/project/37891>

Objection: Moorebank Ave Re-alignment, SSI – 10053 & EPBC ID 2020/8839

We note that this requires approval under Division 5.2 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The Georges River Environmental Alliance (GREA) objects to the re-alignment of Moorebank Ave to the east of the Moorebank Precinct East (MPE) site in respect to its unacceptable environmental and social impacts.

The proposed eastern re-alignment only serves the interests of the proponent (SIMTA), and their project, the Moorebank Intermodal Freight Precinct or Moorebank Intermodal Terminal (MIT), by supposedly providing direct truck access to the import-export (IMEX) rail terminal, the interstate/intrastate terminal, the warehousing, auxiliary services including retail and service offerings, and a rail connection to the Southern Sydney Freight Line (SSFL).

However, the current position and alignment of the road **already provides direct access**, and there is huge scope within the development footprint to ensure that this works. The proposed re-alignment involves high, additional and unacceptable environmental and social costs, whilst the current route provides less of these unwanted externalities. So, on balance keeping the current alignment of Moorebank Avenue is preferable.

Overall issues, objections and GREA recommendations

*It is appalling that the proposed re-alignment is **through a site previously set aside as a biobank** for the huge loss incurred across the mega proposal of the MPE and Moorebank Precinct West (MPW) that covers around 3 sq kms of the local landscape, and has involved the loss of old growth Cumberland Plain Woodlands and more than 40 ha of koala habitat. So a further chewing into the biodiversity offset known as the 'Bootlands' is acceptable. It is particularly wrong that the re-aligned route **will dissect and fragment**, and thus devalue the site as a viable habitat patch.*

*It is also **unacceptable that further offsetting** should be considered as the amelioration, when non disturbance and protection are the only ways in which habitat and rare species can be saved in this area. In other words, **the best management option considering the alternatives within the hierarchy of 'avoid, minimize, remediate and offset'** is to avoid, as in this instance a very viable alternative route is available, and that is the one identified in the original concept plans for the overall development (ie the current location of Moorebank Ave). **If the re-alignment was to proceed it should be an elevated road, that 'flies' over, or alternatively one that 'tunnels' beneath the landscape, maximising vegetation conservation, and enabling the safe movement of fauna to avoid road kill.** With respect to the **upgrade** of Moorebank Rd, even in the absence of re-alignment, **koala floppy top fencing**, must be installed to direct koalas and other species towards adequate **underpasses, designed to best practise standards.** In the worst-case scenario, only proximate koala habitat, could be considered as an offset.*

Here are specific grounds for rejection:

- The Project has the potential to cause serious and irreversible impacts, as a result of the clearing and causing indirect impacts on an intact patch of the **Cooks River/Castlereagh Ironbark Forest**.
- The project will require clearing of 4.72 hectares (ha) of NSW PCT 724 (Broad-leaved Ironbark - Grey Box - Melaleuca decora grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion), 1.13 ha of PCT 725 (Broad-leaved Ironbark – Melaleuca decora shrubby open forest on clay soils of the Cumberland Plain, Sydney Basin Bioregion), 8.65 ha of PCT 883 (Hard-leaved Scribbly Gum - Parramatta Red Gum heathy woodland of the Cumberland Plain, Sydney Basin Bioregion description) and 0.3 ha of PCT 1067 (Parramatta Red Gum woodland on moist alluvium of the Cumberland Plain, Sydney Basin Bioregion). It has been proposed that a **total of 189 ecosystem credits and 876 species credits** are required to offset the residual impacts of the Project. **The calculation of credits indicates a very significant impact. GREA finds it entirely unsatisfactory that credits should be retired, and instead all biodiversity must be protected and maintained in situ instead, making the re-alignment unacceptable.**
- The Project would have a potential significant impact on matters of **national environmental significance (MNES)**, entities protected under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), including the Castlereagh Scribbly Gum and Agnes Banks Woodlands of the Sydney Basin Bioregion EEC, Thick Lip Spider Orchid, and the Woronora Beard-heath and Koalas. **GREA does not accept that losses to these communities and species can be sustained.**
- **Traffic, light spill and noise** will be translocated closer to the Wattle Grove community.
- Based on a review of site history and information for the Project site and surrounding areas, potential sources of contamination and associated contaminants of potential concern that may impact on the Project have been identified. **Sources of contamination include stockpiles of fill material, with potential asbestos containing material, and a former grenade range in the southern portion of the site. Site disturbance is thus unacceptable.**
- The Project intersects **Anzac Creek**, a tributary to Georges River, in a relatively natural state in the vicinity of the south-eastern corner of the MPE site. Existing stormwater drainage in proximity of the project site consists of pit and pipe network and open channels associated with MPE, MPW and the existing Moorebank Avenue. None of this heavily engineered and non-natural waste water management should be used in this area of great environmental sensitivity. Cumulative water quality impacts have not been considered in this application.

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