

## Moorebank I/M Precinct West IPC

Sharyn Cullis, Secretary Georges River Environmental Alliance 18/6/19

### Attention: IPC Panel Members

*Below are the notes that accompanied the power point presentation I made at the Panel Hearing at Brighton Lakes. The power point itself was made available in soft copy on the day. Amongst other issues, not covered, in the presentation, as a result of limited time, was the need to consider the impact on Koalas, a threatened species and recorded at the southern end of the site earmarked for total clearance. Further is the matter that any stands of remnant Cumberland Plain woodlands on the site should be retained, under the provisions of the EPBC Act, as such vegetation communities are critically endangered. It has been estimated that only around 6% of the original woodland communities of the Cumberland Plain still exist. The Intermodal development needs to be planned in a way that does not impact on the significant larger patches of forest cover that has been mapped in the applicants assessment.*

### **“Slide (Introduction)**

Thank you for this opportunity. Today I speak on behalf of the Georges River Environmental Alliance, which has since 1993 acted for the protection of environmental quality, biodiversity and amenity values of Georges River and its catchment.

We object to the approval of the Moorebank Precinct West Modification and Concept Proposal, and urge this IPC to reject both, rather than grant any approvals with the proposed conditions.

With limited time, I will just gloss over 3 of our major concerns, the first is about the unacceptable levels of risk associated with the magnified landfill fill proposal, the second about a failure to properly consider cumulative impacts well beyond the precinct and the third is the failure to pursue proper obligations for water sensitive design and urban heat island mitigation.

So firstly, the modification proposes an increase of fill to the site from just over 46, 000 cubic metres to 1.6 million. That represents a multiple of 34 times the original. It will blanket the entire site that is around 500 metres wide and more than 2kms in length. It will be a new landform, a vast concrete capped plateau, looming up to 3.6 m above the human communities on one side, and the Georges River at its other edge. That is an extreme increase in scale.

**Applying a simple test of common sense blended with morality, that is not a modification, it is really a new proposal.** It makes any past environmental assessment, based on the lesser

amount of fill, invalid. 34 times the fill could mean an uncalculated and unknown increase in a whole suite of risks. That requires a **whole new assessment process**, not just a fiddle with the existing one.

Secondly, I note and appreciate that the Department of Planning and Environment, states in their Assessment Report p. (iv) that any future D/As should include **precinct wide Cumulative assessments** for traffic, noise, air quality, stormwater and ecological impacts and future management should include WSUD and Urban Heat Mitigation. However, I add 2 essential qualifiers that need to be addressed.

The first is that project **impacts are not just precinct wide, but can be felt more broadly, throughout the region**. For example the huge landfill project covered in hard surface capping has the capacity to increase, deflect and re-direct floodwater in unpredictable ways, not previously experienced, not just locally but far downstream.

### **Slide Floodway**

Brewsher Consultants [http://www.bewsher.com.au/pdf/CNF33P\\_1.pdf](http://www.bewsher.com.au/pdf/CNF33P_1.pdf) claimed in a technical paper of 2001 that the Georges River floodplain “ranks as one of the most severely flood prone valleys in the State”. They were referring to the floodplain stretch between Moorebank to Milperra, which is just a few kilometres downstream of this Intermodal site. Since 2001 there has been an intensification of urban development on that floodplain, and approvals were based on risk assessments that **did not foresee a mountain of landfill dumped just upstream, nor its capacity to generate flashfloods and down-river flood deflections. It is disappointing downstream cumulative impacts and maximum floods beyond the 1% standard are not taken more seriously, in this assessment.**

The second is, to **protect and enable WSUD and Heat Island Mitigation in future D/As, this modification must be rejected**. It is the foundation for future D/As, and since it is totally unsustainable and environmentally unfriendly, it will predicate and shape the development that comes after it. Just as an example, the intended fill and its gradients pre-determine the location and form of the stormwater detention basins, which are not optimal in terms of WSUD. Further, thick fill across the site requires the removal of all vegetation. The DoPE report observes this. So how can urban heat island effects be mitigated if all urban forest and canopy tree elements are removed, and replaced by un-shaded concrete and bitumen?

### **Slide(Maps)**

For example, I refer to the substantial ‘urban forest’ shown in Fig 10 of the DoPE Report at the northern end of the site. Retained in the midst of the development it would be heat mitigating. Whilst the distant bio-banked site is as an important offset for other reasons, it

wont be relieving heat on the Precinct West site. That northern forest is shown as obliterated in Fig. 4 which is a layout of the Precinct Concept. That layout does not reflect the need for urban heat mitigation through tree canopy provisions and the NSW Architects Greener Places Policy.

Now, to the much loved Georges River, which is not just a local precinct asset. It is the iconic natural centerpiece of a whole region and a catchment of well over one million people.

### **Slide Riparian corridor**

The reach of the Georges River adjacent to the Intermodal site, is a very vulnerable impoundment behind Liverpool Weir, where pollution impacts are magnified in low flow conditions. This is a particular threat to the aquatic ecosystem, which supports sporting fisherman, who fish this part of the river for Bass. Water quality matters and just downstream is the clubhouse of the NSW Barefoot Water Ski Assn, and the river is their playground. That should not change.

The negative impacts upon the Georges River from this development will be echoed far downstream, whenever high flows overtop the weir. As evidence of this claim, Dr Ian Wright from UWS, in 2012, <https://www.smh.com.au/environment/conservation/regulator-ignores-toxic-plume-polluting-river-for-a-decade-20120717-228jw.html> tracked water quality and ecological impacts from a mining project in the upper Georges and found it had measurable negative effects for at least 15kms. It is critical to protect the green riparian zone and that has been recognised by the DoPE Assessment document.

But, increased stormwater velocities and volumes are certain outcomes of this proposal, and threaten the natural streambanks of the receiving streams. If not adequately managed, these will exacerbate the very real threat of bank scouring and collapse, already both a natural process and an exacerbated human impact in places along the Georges River and adjacent to this site.

### **Slide Erosion**

Any retreat of the fragile river banks will result in the reduction in the width and ecological value of the conserved riparian corridor. This is a strong argument for a riparian setback in excess of the statutory requirement of 40 metres. I note also that 2 of the major stormwater detention ponds proposed appear to be located within what is supposed to be the conservation riparian zone. This is totally unacceptable; the stormwater management basins should sit within the footprint of the development, not in the conservation area.

It is encouraging that the Alluvium Peer Review of the Site Storm Water and Flood Management Plans provide very convincing evidence of shortfalls and failures in what the applicant proposes or relies upon. In their report for example, they claim drainage outlets have “insufficient capacity”(p.21) and information provided by the applicant is “confusing” (p19) and their proposals create, in terms of flood, an “elevated risk to the community.” (p22)

The Report instead promotes an approach where channels are “wider”, with “battered embankments”, “vegetation” and with “a more natural creek form, that is more representative of current practice”. They give illustrations of other more preferable case studies, some dating back to 2007, that are better than what is proposed for Moorebank here in 2019.

The consultants are constrained and diplomatic. I will say what they really mean, the applicant proposes last century style stormwater management, not Water Sensitive Urban Design that protects communities and the environment. Morally, I say to you the Panel, you cannot approve that.

So in conclusion...

#### **Slide (concept Plans of 2013 and 19)**

I really do feel anger at the fact that what was approved in 2013 in terms of a concept plan, has become by 2019 through a set of incremental and cynical modifications, even worse environmentally than it ever was. I feel we have all been conned. Let me illustrate that:

2013 had wide green areas maximized and used as buffers around natural pondages, with no direct discharge into the Georges River indicated. There was plenty of room for grassy swales, bio-retention zones and multi-use possibilities, even wildlife. By 2019, we have deep, narrow and very engineered formal stormwater basins, no greening, and worst of all, three direct discharges to spew filthy, greasy wastewater directly into the Georges River, in huge volumes and at great eroding velocities. That is bad practice not WSUD.

Let me illustrate what that can become

#### **Slide (Warwick farm)**

This is at Warwick Farm just downstream. Note the pipe, vegetation loss, also the excessive rock armouring to prevent the anticipated bank erosion.

#### **Slide (Chippo)**

This direct discharge into the Georges River is at Chipping Norton. The riverbank once in front of this drain has eroded away. The gabion baskets too have collapsed and broken as a result of exacerbated flow velocities coming both out of the drain and along the river channel.

So I predict, with my lived experience and careful observation of the river all of my life, you are looking at what your approval of this project could achieve, along the river frontage of this intermodal site. I hope that is something you might seriously ponder. “

Thank you.

Sharyn Cullis

Secretary, Goerges River Environmental Alliance.

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