



# Sutherland Shire Environment Centre

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

The Sutherland Shire Environment Centre (SSEC) **objects** to the proposal the re-alignment of Moorebank Ave to the east of the Moorebank Precinct East (MPE) due to unacceptable environmental impacts.

Some of the reasons for objection are:

- The current position and alignment of the road **already provides 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). The high environmental costs of the project are unjustified, particularly in view of the unconvincing rationale - for traffic amelioration in a decade's time and to enable a "driverless shuttle carrier system" to "operate efficiently" across the Moorebank Precinct East (MPE) and Moorebank Precinct West (MPW) site. Traffic improvements can surely be implemented within the existing (huge) development footprint.
- The proposed re-alignment **is through a site previously set aside as a biobank**. The MPE and MPW developments result in significant environmental impacts, including the loss of old growth Cumberland Plain Woodlands and more than 40 hectares of koala habitat. It is unacceptable that the biobank should be compromised and consumed by this new and unnecessary development. The dissection of the Boot Land site by the proposed realignment will gravely diminish the viability of the land as habitat and will directly negatively impact threatened species and ecological communities.
- Although Moorebank is outside the Sutherland Shire LGA, the Sutherland Shire Environment Centre recognises the importance of remaining koala habitat across the whole of southern and western Sydney. **The progressive fragmentation of koala habitat not only puts individual koalas at risk, it disrupts the migration and genetic exchange of the surviving population.** Remaining habitat needs to be protected for the ongoing viability of the koala populations of Greater Sydney. The report from the NSW Legislative Council inquiry *Koala populations and habitat in New South Wales*<sup>1</sup> has found koalas may become extinct in NSW by 2050 without urgent government intervention. The report recommends State government 'urgently prioritise the protection of koala habitat and corridors in the planning and implementation stages of urban growth areas'. The importance of koala corridors is noted, with 'safe connectivity between habitat areas' being 'essential for the survival of koalas, as they were not social animals and needed habitat to migrate and exchange genetic material.' Habitat protection is crucial and biodiversity offsets are not an acceptable solution. In the case of the proposed development, it is possible and preferable to avoid habitat destruction in the first place by leaving Moorebank Avenue where it is.

- Irrespective of the re-alignment of Moorebank Avenue, koala floppy top fencing must be installed to direct koalas and other species towards adequate underpasses, designed to best practise standards. Even in the absence of re-alignment, wildlife corridors must be installed.
- The project would cause **negative impacts on other native species 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.
- **The project will require clearing of a number of Plant Community Types (PCT)**, including:
  - 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);
  - 0.3 ha of PCT 1067 (Parramatta Red Gum woodland on moist alluvium of the Cumberland Plain, Sydney Basin Bioregion).

The Sutherland Shire Environment Centre strongly believes in protection of habitat for the remaining native flora and fauna in the Shire and its associated/adjacent bioregions. The rationale for this proposal cannot possibly justify the unacceptable environmental impacts. We call on the Minister for Planning and Public Spaces to refuse consent to this proposal.

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<sup>i</sup> Koala populations and habitat in NSW, NSW Legislative Council, accessed 13.4.21 at <https://www.parliament.nsw.gov.au/lcdocs/inquiries/2536/Koala%20populations%20and%20habitat%20in%20New%20South%20Wales%20-%20Report%203.pdf>