

ADI Residents Action Group
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2nd February 2005

The Hon Bob Debus
Minister for the Environment

RE: ADI Site Regional Park - Contamination & Drainage Basins

Dear Minister

I am a member of the Community Reference Group set up by NPWS to draft a Plan of Management for the Regional Park at the ADI Site. At the most recent meeting, Tuesday the 1st of February 2005, several issues arose about decontamination works commencing in the Eastern most part of the Regional Park (Blacktown LGA) and that Lend Lease have zoning permission to locate massive drainage basins within the Regional Park.

NPWS Officer, Jonathon Sanders, appeared to give a commitment to investigate these matters and provide the CRG and myself with accurate information as to what is being proposed for these areas. Despite Mr Sanders assurance I believe that this matter should be brought to your attention as ADI RAG considers these matters to be of utmost significance

I will deal with each issue separately and have attached a jpeg image of a map of the ADI Site for your reference

Contamination

Lend Lease advised the CRG that it was only now commencing decontamination works within the Eastern Precinct including the Regional Park. Lend Lease has been granted approval from the Minister for Planning to conduct certain decontamination works within the Regional Park. The purpose of Lend Lease's application for such works is to allow unrestricted public access to the Regional Park. Promising public access to the RP is a lucrative marketing tool for Lend Lease and in fact features heavily in their current advertising for land at Ropes Crossing.

It is important to note that the approved decontamination works will involve the investigation and validation of access tracks and paths within the RP to locate and remove discarded munitions debris, capping of Site 15 within the RP with validated soil and slashing of vegetation to facilitate investigative and remediation works.

You might recall that Blacktown Council was originally the consent authority, until the Planning Minister stepped in, and that they were so concerned about the extensive contamination of the RP that they wanted to clearfell the whole area in order to get to and clean every inch of the subsoil. Why did Blacktown Council have such extreme views? Because many Councillors have had years of experience dealing with this site and were well aware that this part of the site since the 1950's was regularly used to dump and bury waste from the munitions factory. Most of these dump sites were unrecorded and randomly chosen.

SREP 30 and EPS 2000 deal with contamination and refers to the Stage 2 Decontamination Audit St Marys Munitions Factory by AGC Woodward Clyde, June 1999. Several areas of the ADI Site including the Eastern Sector were unable to be surveyed for contamination and were excluded from the Site Audit Statement (CHK001/1). The auditor, Christopher Kidd, left the Eastern Precinct RP out of the statement because **full subsurface imaging would have caused an unacceptable impact upon the flora**. Christopher Kidd like Blacktown Council was aware of the extensive contamination of this area and therefore why he felt the need to survey the entire area, not just main tracks, but the entire area.

Christopher Kidd makes several recommendations in his final report including a proposed management plan for this area including, that: The area is to be surrounded by a high chain mesh fence to restrict unauthorised entry,

a strip of land five metres wide on each side of any pathway will be searched with a metal detector and any ordnance related items removed, **any visitors to the area will be accompanied by a guide and movement restricted to boardwalks and well marked paths.**

It is assumed that once Lend Lease complete their decontamination works that the auditor would be called back to validate this area. It would be assumed that the auditor would base his assessment on the recommendations of the 1999 report. It is assumed that the auditor would find that the works Lend Lease have completed are still unsatisfactory to allow unrestricted public access to the Eastern Precinct RP as they have only remediated a small percentage of the Park, some access tracks and Site 15.

We must be realistic here, we have a report from a contamination expert saying that the RP must be fenced to restrict public access, that even after searching and decontaminating areas along tracks that visitors to the RP must still walk on boardwalks and be accompanied by a guide (in this case an NPWS officer). Minister are you concerned then that Lend Lease are pushing ahead with minor decontamination works to allow unrestricted access to your RP? Have you got the resources to monitor and ensure the safety of all who may access this area?

ADI RAG as you know have entered the ADI Site on numerous occasions and we have witnessed first hand that the Eastern RP is randomly contaminated. We discovered **exposed asbestos in this area** of which we removed for evidence. We have discovered asbestos elsewhere on the site, which has been filmed. We recently raised our concerns with the Asbestos Diseases Foundation of Australia.

ADI RAG have argued strongly that the only solution to this problem is to do what Christopher Kidd has suggested, to fence off this entire section of the RP. If NPWS then wants to conduct some guided visits to this area that would be supported. But an unfenced RP with unrestricted public access is totally irresponsible. The Plan of Management must state that the eastern sector of the Regional Park will be man proof fenced with either no public access or closely monitored public access restricted to certain areas.

Drainage Basins

Lend Lease have developed a model map (attached) which they obviously will put forward as the zoning layout when SREP 30 is amended. This map includes several huge drainage basins that are located within the Regional Park (The dark blue areas). Lend Lease claim that that they are not part of the Regional Park because the unamended SREP 30 zones them as indicative location of drainage basins.

ADI RAG has several concerns that need to be contemplated and properly addressed. Firstly; who will own the land zoned drainage basins? Why is it that drainage basins, which are only required because of Lend Leases development, are located within the Regional Park and not on their land? Surely where land is proposed to be heavily modified by the developer it should occur within the development area. It should be strongly argued by DEC that future amendments to SREP 30 include that zonings for drainage basins occur within the land owned by the developer not the public. As DEC only want to manage 850 ha of RP the effect of allowing these massive basins is that the RP will be further reduced in size.

What of the environmental effects? These basins appear to be located along or adjacent to natural creek lines. Are natural creek lines within the RP to be destroyed and highly modified to construct these basins? If not how is water supposed to enter these drainage basins without major modification within the RP of the natural catchment? If they are to form part of the creek won't they then become a dam? How will this then change the ecology of the area? When is works proposed to start on these basins? How will earth-moving equipment access the RP? What will happen to the massive amount of soil removed? Will this require development consent from Penrith Council? Who will manage these basins in the future?

One of the proposed drainage basins is to be located in an area of the RP that was heavily contaminated and despite supposed remediation has been left in an unvegetated and highly disturbed state. Does the Site Audit Statement (CHK001/1) state that this area is suitable for a drainage basin? Is there any contamination issues relating to the areas proposed to locate drainage basins?

Minister we look forward to a response at your earliest convenience and would make ourselves available to meet if further information and discussion of these matters was required.

Yours truly,



Geoff Brown
Convenor
ADI Residents Action Group