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Department of Planning
GPO Box 39
SYDNEY NSW 2001

11 September 2012

Our ref: D12/64506

Dear Mr Beattie,

M2 Motorway Upgrade Lane Cove Rd Eastbound On-Ramp - Submission

Thankyou for the opportunity to comment on the proposed modification request for M2 Upgrade – Lane Cove Road On-Ramp (MP09_0049 MOD 1) project.

The Modification Environmental Assessment Report Ref 60267284 has been considered and the City of Ryde is generally supportive of the proposed M2 upgrade modification which it believes will ultimately improve traffic flow and avoid traffic congestion through Macquarie Park. The proposed eastbound on-ramp was recommended in the Ryde Integrated Transport and Land Use Strategy 2007 and its inclusion in the overall M2 Upgrade Project is therefore welcomed.

However, there are several environmental areas of concern that will need to be addressed to ensure the modification can proceed without detrimentally affecting the local environment. These concerns primarily relate to stormwater management, ecology and construction noise impacts on residential receivers.

Council's position on these areas are discussed in detail below with accompanying request to alleviate concerns raised:

1. Noise impacts from construction activities needs to be better managed to protect residential receivers in close proximity to the proposed works.

Council Interest

The environmental assessment states that residential receivers closest to the proposed work will be significantly impacted by construction noise both during daytime construction hours and particularly when construction activities need to occur outside normal daytime hours. The acoustic assessment states permissible noise levels will be exceeded by up to 21dBA during daytime activity and up to 24 dBA during night time activity at the closest residential receptor.

The City of Ryde will expect that noise respite periods, construction hours of operation and guidelines for staging of noisy works are to be adhered to at all times.

Proposal

In addition to proposed noise mitigation measures proposed in Section 5.6 of the Acoustic Assessment Report and the original conditions of project approval by the Minister for Planning on 21/10/10 including the need to comply with EPA license conditions and to host a dedicated complaints hotline, Council is also particularly keen to ensure that excessive noise to local residents is minimised by the selection of appropriate methods and equipment and the use of screening or barriers where practical. Given that significant construction noise impacts are likely, the City of Ryde suggests that the Proponent should specifically notify and work closely with most affected residential receivers during noisier activities to implement mutually agreed on-site specific noise mitigating measures to further minimise disturbances.

2. The potential removal of critical habitat for threatened faunal species that may either roost or forage the development area has not been adequately assessed.

Council Interest

The level of investigation used to determine impact to potential presence of Green and Golden Bell Frog in or by existing wetlands or roosting locations for the Eastern Bentwing Bat known to forage in the area is inconclusive. The Environmental Assessment Report asserts that the existing artificial wetland is a favoured habitat for the Green and Golden Bell Frog however stops short of confirming presence of frogs or classifying habitat as a core site. The Assessment Report also confirms the presence of the Eastern Bentwing Bat, although the report could determine whether the bats were roosting or foraging the area.

The City of Ryde acknowledges a 7 Part Test was conducted which found that no significant impact is likely to occur on any threatened fauna as a result of the Project. However, there are clearly threatened fauna in the area and the Proponent has a social and environmental responsibility to protect existing habitat as much as reasonably possible.

The proposed action to have a qualified ecologist available present during the pre-clearance stage is supported however the plan to manage any threatened fauna found during that stage is considered too late. It is the City of Ryde's view that there should be an appropriate predetermined recovery plan in place so that any threatened fauna found at any time and in need of protection or relocation is properly managed.

Proposal

The City of Ryde recommends that, wherever possible, existing habitat should be protected and where this is not possible that a predetermined species and habitat recovery plan should be in place prior to pre-clearance survey performed by qualified ecologist in order to avoid indiscriminate habitat destruction or species disturbance.

3. Water sensitive urban design and surface water management to treat stormwater runoff during and post construction is lacking.

Council Interest

The City of Ryde is committed to preserving the water quality and riparian ecosystems of Ryde's water catchments areas. It is important that the modification has a minimal impact on these natural assets. The City of Ryde has specific interest in the motorway's stormwater collection and treatment systems, culvert design, transverse drainage devices, polluted water management on site during construction and minimising disturbance to the riparian zones surrounding the motorway.

Drainage design details and stormwater management in-particular how the wetland basins will be used has not been sufficiently detailed in the submission and it is very difficult for the City of Ryde to make an assessment on potential environmental impacts without this data. Notwithstanding, it is expected that relevant details do exist and can be covered under the original conditions of Project Approval.

Proposal

The City of Ryde recommends a WSUD approach be adopted for all M2 upgrade works to ensure Australian Runoff Quality (ARQ) targets for waters discharging to waterways are achieved. In this regard, all relevant conditions of Project Approval dated 21/10/10 should apply to stormwater, and erosion and soil runoff during construction and site establishment phases of the work.

The Proponent should clarify the performance of the existing basins in meeting gross pollutant targets and retention as habitat for fauna.

In general, gross pollutants should be removed from the stormwater system prior to the first flush entering the existing basins. In addition, the installation of bio-swale design with an appropriate filter media provided upstream of the basin would be a cost effective means to maintain the integrity of the basins and to achieve ARQ guidelines.

4. Use of Council land for the siting of M2 Construction Compounds requires approval beforehand

Council Interest

The current proposal has slated 3 potential sites for construction compounds. The use of these sites are not a forgone conclusion, particularly where Council land is targeted. The City of Ryde will require a detailed submission by the proponents to allow a detailed assessment to be conducted. Permission will only be granted if the sustainability of the site and amenity of the locale can be guaranteed.

Proposal

Proponent to provide detailed construction compound site specifics for consideration and determination prior to the compounds being constructed.

5. Specific detail on proposed Wicks Rd bridge widening is lacking and the Proponent has failed to provide any detail concerning required street-lighting installation and ongoing charges for proposed under bridge widening construction.

Council Interest

The Modification will involve widening of Wicks Rd bridge to accommodate the eastbound on-ramp and lane. This is likely to require some alteration to the Council's Asset Management Program and will also require street lighting installation and ongoing charges to ensure the safety of the underbridge traffic.

The City of Ryde does consider it equitable its ratepayers should have to pay to light this area as the benefit of the bridge extension is held by the M2 proponents only, yet the negative impact of in-sufficient lighting to safety travel is held by the wider community.

Proposal

The City of Ryde recommends that specific details of the proposed Wick Rd bridge widening be submitted so that it can plan for any likely changes to the Wicks Rd Asset Management and Maintenance Program.

In addition, the City of Ryde seeks assurances from the Proponent that the underbridge extension will be lit at or greater than the current level of service and that the cost of installation and ongoing use will be held by the proponent in-perpetuity.

Conclusion

The City supports in principle the Modification Request for the M2 Motorway Upgrade and the provided measures identified in the Environmental Assessment to mitigate any negative outcomes from the proposed eastbound on-ramp and lane. It is of the utmost concern for the City of Ryde that these measures are properly implemented.

Council will await your detailed response to Council's strong interest in the project during the submission response period.

For further enquiries regarding this submission please contact Sam Cappelli, Manager the Environment on 9952 8263.

Yours sincerely



Dominic Johnson
Group Manager
Environment and Planning

