



**Planning and Environment
Attention Mark Brown,
Forwarded without letterhead 4.9.14**

RE: M2 site subdivision EIS

Dear Mr Brown,

Please find our submission to the above EIS. We have included letterhead as follow up to original submission forwarded last week via Nicola Chisolm.

We write to express concern at the inadequacy of the environmental assessment which has been undertaken to develop the M2 site (parcel 5 of the lands surplus to the M2 Tollway). This inadequacy has led, not just to an overdevelopment of the site but will lead to further loss of local biodiversity and degradation of local watercourses. These were matters which the Society raised at the commencement of the consultation process. They were matters addressed in Council's strategic planning for the corridor but were ignored in the State Significant SEPP planning process undertaken by the State Government which removed the local Council as consent authority .

The site contains habitat for threatened species protected under state legislation and an endangered ecological community which is listed under both State and Commonwealth threatened species legislation. There is an opportunity to address habitat gaps and restore some limited canopy connectivity across the site so as to mitigate degradation of sensitive bushland from isolation and fragmentation. This has not been addressed in the subdivision plans and supporting documents in the EIS.

The Society has repeatedly stated that the site contains a natural wetland which both assists in flood control for the Porter's Creek catchment as well as contributing to improved water quality flowing into the Lane Cove River National Park. This catchment has had serious flooding in the past and includes sections which flow along Wicks Rd into the piped section below the old landfill. The Society is not convinced that Urban Growth, and the consultants engaged to prepare the stormwater plans for the site, have understood this local history.

Once again, similarly to the need to remove Tennis World from the SEPP, the State Significant SEPP process has identified the futility of "spot rezoning" - the local Council, best positioned to undertake the necessary strategic planning to identify appropriate land use and development constraints is removed as the consent authority.

We expect that our concerns will continue to be ignored. Given the State Government's commitment to involve the local community in local planning decisions we urge that full consultation occurs with the City of Ryde regards the need to protect local stormwater infrastructure and how it integrates within the existing structure. Council and its ratepayers ultimately will bear the cost of failing over taxed stormwater systems.

Our specific concerns are:

1. The need for a full ecological assessment of the site and adjoining land parcels. This will ensure identification of any remaining significant remnant trees on the M2 site and how best to achieve some minimum level of canopy connectivity between the important Bundara Reserve and the Porter's Creek bushland (what remains of Wicks Park Crown Reserve).

2. The need to assess bushland on the RMS land and how the pylon for the overhead bridge will impact on the RMS land and adjoining Bundara Reserve. There may be a need for offsets to be identified as this is part of a Commonwealth listed endangered ecological community. There is also the need for strategies to ensure canopy connectivity with the station site to the north.

3. The State Government needs to take responsibility for any over-development of the site. Council must be satisfied that the proposed design and stormwater system to be installed at the subdivision can be effectively integrated into the existing system. We are not confident that there will be no net increase in flows off the site when it is developed, as was stated by the consultants for Urban Growth. The State Government should not approve the subdivision until Council is satisfied – it will be Council and its ratepayers who will bear the cost of any future upgrade of over taxed and failing local stormwater networks. In the Porter's Creek catchment this has the potential to impact on the leachate recycling system controlling pollution in the Lane Cove River – flow off the old tip is a major point source of pollution which has been expensive for Council to manage for many years.

In summary, the Society considers that any increased returns the State Government receives in the over-development of this subdivided site will be far outweighed by the loss of local amenity, biodiversity and lost economic opportunities for the local community. We urge that full consultation with the City of Ryde occurs prior to approval of this subdivision.

Yours sincerely
Cathy Merchant,
President, RHHFFPS

CC All Councillors City of Ryde and Dominic Johnson, Acting General Manager.