



Dear Sir/ Madam,

On behalf of the Mulgoa Valley Landcare Group, I wish to submit the following comments in relation to the Environmental Impact Statement for the upgrade of the Northern Road.

- **Fragmentation of Landscape and impact on movement of wildlife.**

The redevelopment of the Northern Road will have enormous impacts on our local vegetation communities and wildlife habitats. The widening of this roadway to a width of over 75 metres dissects a landscape which supports critically endangered vegetation communities and many threatened species of wildlife. In general terms, the Environmental Impact Statement lacks detail and lacks credible solutions that acceptably manage the problems associated with loss of Critically Endangered Vegetation Communities and further fragmentation of our landscapes in Western Sydney.

Two years ago, the Mulgoa Valley Landcare Group attended community consultation forums and made a written submission to the RMS in relation to the intersection of the Northern Road with the Cumberland Conservation Corridor. We were assured that we would have sufficient opportunities to discuss and negotiate a suitable solution for the safe movement of fauna in the vicinity of the Defence Establishment Orchard Hills and more specifically along the Surveyor's Creek corridor. This consultation has not occurred.

In response to multiple phone calls, a meeting was arranged just last week. The road upgrade is already progressing while the EIS remains in draft form and the conceptual designs are (apparently) just that. Yet we were advised that a suitable solution for a macro fauna underpass is not possible.

The height of the proposed fauna underpass is currently 1.5m. Many Eastern Grey Kangaroos are taller than this. So, in this modern age of technology, we are to install a completely insufficient and unusable underpass that asks our kangaroo population to crawl through a 75 meter tunnel that is lower in height than they can stand. The 'RMS suggested height' of 1.5m fails to take into account studies that can demonstrate the need for greater height in the underpass. I am appalled by this lack of expertise demonstrated by our specialist government agencies.

Clearly it is a question of economics when a dairy cow underpass at Leppington can be constructed at 3m height neither without question nor without mention of cost impacts to the taxpayer whilst a wildlife underpass (with no economic influence) can only generate a



1.5 m underpass. This is a shameful indictment on our civilised society – when only money talks and our moral obligation to those we share the planet with is yet again overlooked.

I repeat that the Cumberland Conservation Corridor intersecting with the Northern Rd was identified two years ago. I advise that the Federal Government has invested over \$50 Million to ensure the viable functioning of the Cumberland Conservation Corridor and I lament that yet again the NSW Governments fails to acknowledge and support the community and the Federal Government in ensuring that an appropriate underpass is integrated into this road upgrade. I demand a viable solution to the insufficiencies of this proposed fauna crossing and suggest that solutions can and must be found. This includes future fencing needs and potential for overpasses (e.g. possum ladders) and a tunnel height of not less than 3 m. The collective intelligence of the RMS can ably solve this matter and the cost will be borne by tax payers who have collectively destroyed the natural values of the Cumberland Plain – it's a simple user pays solution.

- **Lighting**

Light pollution affects our threatened bat and owl populations and our mammals that move at night. The Northern Road is not currently lit, and nor does it require floodlighting when all vehicles are adequately equipped to be driven at night. The M4 is not lit and hence we demand that lighting be limited to the larger traffic intersections only.

- **Extensive removal of canopy species without compensation.**

The EIS makes reference to loss of some canopy species within the development footprint but does not appear to find value in all of the mature canopy species being removed. Large numbers of canopy trees in the Orchard Hills area (in the extension of Cross St to Wentworth Road) have already been removed with apparently no requirement to offset the habitat losses. Did these trees have no value to our birdlife, invertebrates or small mammals? Who decides that an avenue of trees in the extension of a road reserve off Wentworth Rd in Orchard Hills has no value? All habitat loss in a Critically Endangered vegetation system must be compensated. The EIS has grossly underestimated the offsetting required to compensate for direct losses and for the flow on effects associated with this development. As clearly mentioned within the EIS, this development must be looked upon as part of the whole re-development of Western Sydney and the CUMULATIVE impacts of this development along with all that is occurring both with public and private development



is overwhelming. The impacts associated with the Northern Rd upgrade must be considered as only a part of the most massive assault on the ancient landscape that we call the 'Cumberland Plain' since time began.

- **Loss of threatened species with the extension of Vineyard Rd.**

Within the EIS, I was unable to locate any reference to the extension of Vineyard Rd in Mulgoa. As it happens, this area of bushland that will be obliterated forms part of a significant east-west terrestrial corridor which exists but unfortunately is not identified on the NSW Biodiversity Offsets Map (therefore it doesn't exist?) This area that will become Vineyard Rd as it joins into Kingshill Rd is a pocket of bushland containing many threatened plants including *Pultenaea parviflora* and *Marsdenia viridiflora*. I would like to know at what stage 'ground truthing' will take place and if the RMS intends to identify and offset these plants – or was the RMS hoping that the community hadn't noticed or wouldn't care about the destruction of a CEEC and threatened species caused by the extension of Vineyard Rd.

I object to the standardised response that only a few threatened plants will disappear and that they are found somewhere else nearby. This is the standard answer of every developer and landowner in Western Sydney and provides no solution other than with this careless attitude, these threatened plants will be whittled away to just one patch. I demand that the losses of each and every identified threatened plant be offset by permanent conservation of a nearby population (and not a population which is already conserved – we demand additionality. I have GIS maps of the plants that will be affected by the extension of Vineyard Rd.

- **Offsetting of Conservation Lands located on the Defence Establishment Orchard Hills**

In 2007, the community of Western Sydney lobbied very hard for the commitment of both major political parties to ensure that all of the 1370Ha listed on the Register of the National Estate and located on the Defence Establishment Orchard Hills was guaranteed a conservation future. This election commitment of both major parties was honoured and it was a huge success for the community and the environment of Western Sydney. I cannot describe the amount of volunteer time dedicated to meetings, submissions and hours and months and years of work it required to secure that conservation win



Suddenly and without any regard to this commitment, that win for our environment is now 10 Ha less. It is of great importance that RMS specifically identifies where the additional 70Ha required to compensate this loss will be located. It is of utmost importance that there is not a 'splatter-gun' approach as result of BioBanking on various properties without any formed connectivity – we demand a contiguous parcel of 70Ha of 'like for like' vegetation to compensate for the whittling away of the biggest conservation win the Cumberland Plain will ever see. The RMS has a particularly poor history of offsetting and I have no faith that the demands of this project will be suitably met. The Mulgoa Valley Landcare Group will insist this time on transparency of the offsets process with specific information regarding location and connectivity and will use media and political pressure to ensure that this occurs.

- **Ineffectiveness of BioBanking as the only vehicle for offsetting losses**

The ONLY vehicle that is mentioned by the NSW Government for compensating the losses of our critically endangered vegetation communities in Western Sydney is BIOBANKING. Likewise, for the Western Sydney Airport, the North and South West Growth Centres and every other infrastructure imposition Western Sydney is BioBanking. Yet, BioBanking is a voluntary scheme. We will rely on the voluntary participation of private property owners to enable success. And so we must all wait while individual landowners evaluate their options – to sell to a speculator offering ridiculously inflated property prices – or to BioBank? Clearly most humans are financially driven and the offers made by property investors and speculators are winning the race to land bank in Western Sydney. Even now, there are insufficient offsets available to supply the offset needs for current development. The voluntary option is ridiculous and will fail.

There is roting of the system with the BioBanking of land already conserved (such as Council parks and the Western Sydney Parklands). So when will the NSW Government offer up some true additionality in terms of conservation offsets and **actually acquire land for the purposes of offsetting vegetation losses**. Western Sydney deserves a new nature reserve as a result of this development assault and we ask that RMS procure land to be managed for conservation – not just buy credits from a register. The fanciful notion that BioBanking will provide suitable compensation of the loss of our critically endangered vegetation communities is a myth.

When a hectare of CEEC is cleared – up to 7 times that amount must be secured as an offset. Please explain how the 60Ha that is being cleared for this development will be offset with the 'up to 7 times' the amount needed to compensate ie 420Ha.?



The Community of Western Sydney is entitled to know exactly where these 420Ha of compensatory offsets are located. The simple purchase of credits from a register is not the answer that will suffice. It is important the RMS clearly identify exactly the location that our offsets are. The Mulgoa Valley Landcare Group also demands that property acquisition and, in some cases, compulsory acquisition (as per infrastructure needs) are made for our environment needs as well. The NSW Government will buy a piece of land to build a road – but refuses to buy a piece of land to prevent the extinction of an ecosystem. Roads can be made, changed and realigned. Ecosystems cannot. Yet the government will commit to infrastructure - but will place the onus of preserving our critically endangered vegetation communities on the voluntary participation of private individuals. Appalling, ineffective, and destined to fail – and yet our environmental specialists within our government agencies claim that ‘BioBanking’ is the answer. BioBanking is only the answer if ‘extinction?’ is the question. Future generations will look back on this pivotal moment in time and truly question the leadership offered on this most significant issue of biodiversity conservation and will be equally appalled that it warranted only ‘voluntary participation’ when less than 5% of extant vegetation remained.

I look forward to your response.

I will not accept a generic and ‘table style’ response to my submission – but will request answers to the specific questions I have raised in my submission

Sincerely

Lisa Harrold

President

Mulgoa Valley Landcare Group

2<sup>nd</sup> August 2017

CC Mayor and Councillors of Penrith

CC LLS

CC OEH

CC Member for Mulgoa and Western Sydney