



Ryde - Hunter's Hill Flora and Fauna Preservation Society

Member of Nature Conservation Council of N.S.W.

**P.O. Box 2127
Boronia Park 2111**

Ms Natasha Harras,
Department of Planning and Environment,
23-33 Bridge St, Sydney NSW 2000
17.7.15

**RE: S96 Modification Application SSD_5093 - M2 Site, North Ryde Priority
Precinct**

Dear Ms Harras,

We forward a submission to the above S96 Application. We are a local conservation group established in 1966 which has had a long interest in development on the M2 site, one of the last surplus land parcels along the M2 Tollway corridor. A local resident brought this S96 to our attention. We were not directly notified about it. Could we please be informed of any future amendment to approvals on this site?

As DoP&E will be aware this site is within a sensitive ecological corridor which contains endangered ecological community to the east and a natural riparian zone with adjoining melaleuca wetland. It is in close proximity to Lane Cove National Park. We have previously expressed concern at over development of this site which is subject to flooding at its western end.

We are particularly concerned with the need for protection of the underground culverts which Porters Creek runs into after leaving the site. These culverts pass under the old Council tip site and into the Lane Cove National Park. Leachate from the old land fill is a major point source of pollution of the Lane Cove River.

This particular S96 modification suggests less environmental impact is to occur than with the approved relocated gas line. It would seem that the bushland reserve will be a more consolidated reserve with this amendment and a better outcome for native fauna using the riparian area. Remnant bushland on the former Wicks Park has been degraded through neglect but still provides habitat for native fauna especially small birds.

However, the new route may create other problems and without the benefit of relevant supporting assessment reports exhibited as part of the application it is difficult to know whether it is a better environmental outcome in the longer time.

What this S96 application does highlight is the overall lack of strategic planning that has accompanied the Government's push for development on the site. One would presume that if a proper and adequate environmental planning and assessment process had been in place to develop the site in the initial stages that this S96 would not be required.

Problems associated with the approved route of the gas line would have been identified via that process. It is arguable on environmental grounds that the existing route of the gasline along the spine road is actually the best location. This location also reduces fire risks and avoids further fragmentation of remnant bushland.

However, though the amendment suggests less ecological disturbance than the original approval we have a number of comments:

- a) both the approved, and proposed new, routes of gas line create potential conflicts;
- b) the relocated gas line is not marked on the maps included in the ecological report and it is unclear where it is located in relation to the existing concrete culvert servicing the M2 Tollway;
- c) we remain unclear how the new section of gas line fits within the existing gas infrastructure network;
- d) what remediation of the relocated line will occur, will it assist habitat connectivity and who is responsible.

Concern a) The approved route of the relocated gasline, whilst mostly on the perimeter of the bushland reserve except for where it crosses the creek, encroached into the reserve. We presume that access and on-going maintenance checks would be required for the gasline after construction. In the case of the approved gas line this would necessitate access to the bushland reserve. Management of the gas line could create management conflicts with the requirement for the 30m vegetated buffer along Porter's Creek by Urban Growth for five years. The amenity of the bushland reserve and its boardwalk could also be compromised.

Though the proposed new route for the gas line avoids entering the bushland reserve many of the problems associated with its construction are similar to the approved route: the removal of many trees, possible disturbance to a natural riparian zone and wetland, removal of native fauna habitat including that used by threatened fauna, soil stabilization and revegetation within a flood zone and removal of rocky outcropping. Since it is unclear where the proposed new route is to cross Porter's Creek there could be an additional problem of physical interference of the inlet culvert at Wicks Road.

It may be that the best location for the gas line is its current location where it is largely outside the flood zone and unlikely to interfere with the riparian zone of Porter's Creek and its underground culverts.

Comment b) runoff from the M2 Tollway has caused significant degradation of bushland along the road resulting in weed invasion and increased polluted sediment loads flowing into local streets. This was a major concern of the Society in the early years after the road opened. Road operators took some time to get the concrete drainage line in place and the construction of controls at the point it enters Wicks Rd. The buffer zone has never been maintained. Mostly weeds have replaced the initial native plantings. However, the culvert does serve a purpose as a measure to control road runoff. Sections of Wicks Road are known to experience flash flooding.

However, the supporting documents to the amended plans do not indicate where the new gas line will run in relation to the existing concrete culvert.

There is the potential to create future conflict between the need to control road runoff and the new gas line and its maintenance requirements. It is disappointing that approval is being sought to amend plans without consideration of these possible conflicts. There needs to be good environmental assessment of how road runoff management can be improved as part of this process to relocate the gas line. Locating a new gas line in straight lines in the absence of such assessment could create further drainage problems and exacerbate the serious weed situation caused by the runoff in the longer term.

So as to identify conflicts associated with the proposed amended route of the relocated gas line it could be useful to consider how the gas line and culvert will function together in a close location. Presentation of their interrelatedness on a plan would seem a basic requirement.

Comment c): we trust that due consideration has been given to how the new gas line will integrate with the existing network to avoid future conflicts and the need for further disturbance.

Comment d): since these proposed works are now outside the M2 site we are unclear who will be responsible for remediation after construction of the gas line and for how long. Any re-vegetation required after construction should be of local indigenous plantings, not cultivars which are often used to avoid supply shortage because orders for local indigenous plants were placed too late. From our observations, this often occurs on poorly planned big projects.

Conclusion: the need to amend plans to relocate the gas line exposes the inadequacies of the initial environmental planning assessment that occurred for this site. Planning control over the site was removed from the local Council who had developed strategic planning controls for the area. It was approved by the State Government in the absence of any integrated planning context.

We have argued that there is a need to reduce the number of super lots developed on the site so as to ensure that the Porter's Creek culverts are not overloaded. Pollution of the Lane Cove River could be serious if they fail and repair of the culverts would be expensive. We remain unclear who would be responsible for any failure of the culverts through future overloading of flows caused by unmanaged flows from the site post development. It is unfair to shift responsibility to Council.

It would seem sensible to reduce the number of superlots by the removal of two lots closest to the creek and wetland. This would allow consolidation of a larger bushland reserve and improve habitat connectivity which is critical given its close proximity to the National Park.

This consolidated bushland reserve and wetland could be incorporated into drainage controls across the site and assist in flood control. It would control flows into the underground culverts, especially during peak rain events and provide improved protection to the failing culverts.

Yours sincerely,

Cathy Merchant, President.

CC City of Ryde, Minister Rob Stokes.