

Cathy Merchant  
9 Glenview Cres  
Hunters Hill 2110  
18.6.19

**RE: SSD 8707 Ivanhoe Estate Redevelopment - Concept Plan**

Dear Sir/Madam,

I wish to object strongly to the above Concept Plan for Ivanhoe Estate.

I do not feel that the proposed development plan has adequately considered the environmental constraints across the site in particular the presence of critically endangered Sydney Turpentine Ironbark Forest (STIF) and a regionally important riparian zone.

In 2005 Turpentine Ironbark Forest was listed as critically endangered under the Commonwealth's threatened species laws. The supporting arguments for this status included that it had had a very severe decline in its geographic distribution of over 95% and due to its restricted geographic distribution threatening processes would cause further future loss and reduced ecological integrity.

Last month, the NSW Threatened Species Scientific Committee reclassified STIF from an endangered to a critically endangered ecological community. The supporting arguments for this reclassification included its very largely reduced and highly restrictive distribution; its poor representation in formal reserves; the removal of larger old hollow bearing trees and that STIF remnants are small and fragmented and in close proximity to houses where weed invasion is frequent and pressure to establish Asset Protection Zones is greatest.

I do not feel that the environmental assessment of the Ivanhoe Estate submitted with this application has properly recognized the importance and value of the shale forest as stated above under legislation. The responsibility to preserve these important biodiversity values is not reflected in the concept plan developed by the State government. In particular, the construction of a slip road off Epping Rd through the core habitat area of the endangered forest will further fragment and destroy the integrity of the remaining habitat corridor.

This approach to management of the remnant STIF is also inconsistent with the GSC Sydney Plan which recognizes the need for improved strategic management of natural bushland and the protection and enhancement of Sydney's biodiversity. For example the need to reduce edge-effect impacts on any remnant natural bushland as part of any development proposals.

Further the removal of a large number of trees along Epping Road is contrary to the GSC's stated intent to sustain a boulevard of trees along road corridors such as Epping Rd.

As well as this failure to properly protect remnant STIF across the site, the supporting documents limit mention of important considerations necessary for the longer term environmental protection of the site and the enhancement of its biodiversity values.

Matters such as those stated below are poorly considered:

- understanding all the threatened species visiting the site and their habitat needs;
- the interrelation of drainage lines across the site;
- how habitat connectivity will be achieved during and post construction;
- the impact of deep soil excavation on the viability of future replacement trees and
- the installation of nesting boxes to replace removed hollows

Cumulatively there will be a significant adverse impact on the biodiversity values of the site that is not in the public interest especially given that the site is publically owned land.

The application makes no referral to the Commonwealth for ecological assessment of the impact of the Concept Plan.

I have no confidence that any proposed biodiversity offsetting can match the biodiversity loss associated with the exhibited Concept Plan. Offsets will not be like for like and may be monetary and directed to ecological restoration of vegetation very different to that on the site.

I urge that the State government as owner of the land complies fully with the intent of relevant threatened species legislation to protect and enhance biodiversity and take account of the GSC's Sydney Plan.

I urge that the State government develops a new Concept Plan that takes account of these above concerns. I urge that the proposal by City of Ryde for an E2 zoning along Epping Rd and Shrimpton's Creek riparian zone be respected and that a future draft Concept Plan excludes this area from any housing or road development.

Yours sincerely

Cathy Merchant