

6 May 2019

Director-Infrastructure Projects  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Sir/Madam,

**I strongly object to the Bicycle Path in Patmore swamp and object to the Extension of the Shared Pathway detailed in the Preferred Infrastructure Report (PIR) (Application number: SSI\_8931)**

I am a resident of the Moorefield Estate and will be heavily impact by the proposed changes. I am an active local cyclist and I do support the government active transport policy.

I DO NOT support the route that has been proposed by the RMS and urged the Department of Planning and Environment to direct the RMS to investigate alternative routes that do not go through heritage listed Wetlands.

I have read the Preferred Infrastructure Report and have a number of concerns that require addressing.-

- The PIR is a bolt on plan of the F6 Project that is poorly planned and not welcomed by the community.
- This PIR is OUT OF SCOPE and should not be built through the Patmore Swamp.
- RMS Community Consultation Strategy has been designed to silence the St George Community.
- The PIR does not recognise the Patmore Swamp as a Freshwater Wetland EEC.
- The cycle pathway does not have the endorsement by the local Bayside Council and does not have community support. I strongly reject the idea that the extension of the pathways is a result of community consultation.
- The RMS have used poor criteria to evaluate the preferred shared pathway route. This route does not have the support of the community.
- It does appear that the RMS have targeted all EEC within Patmore Swamp. The proposed route goes through the EEC instead of planning the route around this endangered vegetation.
- The construction of the extended pathway will risk our Key Fish Habitat which is less than 100 metres away.
- The PIR does not address the impact of endangered fauna like the Southern Myotis. It relies on the EIS which has incomplete data.
- The construction of the extended pathway will destroy the Patmore Swamp landscape, a locally list heritage item. The proposal will diminish the heritage value of the Patmore Swamp.

I request that the Department of Planning and Environment does not support the pedestrian bridge, cycle way and its extension of the cycle pathway as it will destroy our precious Patmore Swamp.

I have outlined my concerns in the attached submission for your review.

Yours sincerely

Stefanie Dietsch

## Poor Community Consultation and its consequences for my community

I was very disappointed to receive the email from the Department of Planning and Environment just before the School Holiday/Easter Break requesting submissions for the Preferred Infrastructure Report. The number of technical documents to review is over 500 pages and yet another short time allowed for the community to make considered response.

As a public servant of over 30 years' service, I have always had a strong belief in the purpose and due process of the government. If the Roads and Maritime Services department (RMS) goal was to provide good quality community consultation, then I believe that they have failed to achieve this for the community of the St George District.

If the RMS valued constructive feedback, the community would not be asked to submit responses at holiday periods. The RMS have now displayed a consistent approach to placing the submission process for the F6 project at significant holiday periods of Christmas and Easter/School Holidays.

- First submissions due 14 December 2017 (Christmas no 1)
- Second Submissions due 14 December 2018 (Christmas no2)
- Third Submission due 8 May 2018 (Easter and Anzac Day)

I believe setting such a deadline for the PIR as we approach the Easter Break and school holidays is thoughtless and insensitive to the St George community. The PIR is guaranteed to receive fewer submissions due to the lack of time given and during yet another holiday. This strategy implemented by the RMS seeks to silence our community opposition with the ultimate outcome being the F6 and PIR will be approved by the Minister of Planning and Environment.

## No community support for the Southern Extension of the Pathway

The PIR provides a biased and misleading impression that the cycleway through Patmore Swamp is welcomed by the community. The community and council have provided comment on the Bicycle path route and it has been ignored by RMS. We welcome a cycle way but NOT through Patmore Swamp.

The Overview section on page 12 of the Preferred Infrastructure Report (PIR) makes no mention of community opposition to this section of the project. It is written to give the impression that the community would welcome a pathway through a heritage site and endangered ecological communities. In my submission (#00158), I strongly objected to the bicycle path being built through Patmore Swamp.

In the submission provided by Bayside Council it was specifically requested that the “Transport route be moved out of the wetlands/endangered ecological communities, particularly Scarborough Park” & “Construct a cycle path on the eastern side of Scarborough Ponds between President Avenue and Barton Street (Ref: Page 10, Bayside Council Submission, December 2018). The RMS response to this very reasonable request has been ignored and the pathway extended to destroy yet more of the Patmore Swamp.

There were five community submissions for the F6 that can identified as representing a bicycle organisation. I have evaluated the five community submissions from Bicycle groups:-

- #000024 –St George Bicycle Group (Member)
- #000177 – Bike East (President)
- #000208 - St George Bicycle Group (President)
- #000190 - Bike East (Member)
- #000195. –Bicycle NSW

Two of the five submissions preferred option A route on the eastern side (#000177 & #000208), whilst the other three cycle groups did not state a preference. Of the 500 community submissions, I did not find one that preferred Option E on the Western side, but did find many community submissions opposing building a cycle way through Patmore Swamp. After reviewing the community submissions, it is clearly apparent that the RMS are the only group that prefer Option E.

As a resident of the Moorefield Estate for over 25 years, I was very upset to read on page IV of the PIR that the cycle pathway will “deliver benefits for the residents of the Moorefield Estate”. My views have not been represented in the submission report and I have not been able to find any mention of my objections in the response to submissions.

The St George Leader published an article title “RMS denies Patmore Swamp 'will be destroyed' by F6 cycle path extension” (Ref: <https://www.theleader.com.au/story/6095198/updated-cycle-path-enviro-threat-denied/>) on 30 April 2019. This article represents the concerns of the Moorefield community Group lead by Anne Field (Ex Rockdale Councillor), Bob Greenhill (Sydney Barrister) and John Paxos (Local Businessman). I support the Moorefield Committee in their views about the concerns for the Wetlands.

I received a visit from the RMS staff on Friday 2<sup>nd</sup> May between 9am to 1pm. I was not at home and was left the card shown in Figure 1. I am very disappointed that it has taken the RMS five calendar days before the submissions are due to speak to me about the PIR. I was not involved in any consultation about the extension of the pathway. This last minute contact further demonstrates that the RMS have not provided good quality community consultation.

Figure 1: RMS card left under my door on 2<sup>nd</sup> May 2019.



I strongly reject the idea that the extension of the pathways is a result of community consultation. It has been proposed by lobby groups' who do not represent my community and wish to destroy my wetlands that I love. There is no member of the community on this Stakeholder Liaison Group to represent the general views of the community who live close by to the proposed F6 portal and Patmore Swamp.

There is no community support for a cycle way through the Patmore Swamp. I urge the Department of Planning and Environment to advise the RMS to seek alternative route to deliver a cycleway that does not destroy a heritage listed wetlands.

## EIS & PIR used poor criteria to select Western Option E

The EIS provides a very weak case for selecting the Western route option through Patmore Swamp. In the EIS the following reasons are given for the Western option being the preferred option (EIS, Chapter 5 Page 20):-

- Follow the existing path alignment with Rockdale Bicentennial Park north
- Provide a direct connection between council owned open space/recreation areas
- Minimise the visual impacts of the project
- Provide a connection to shared pedestrian and cycle network for the residential catchment west of Scarborough Park North.

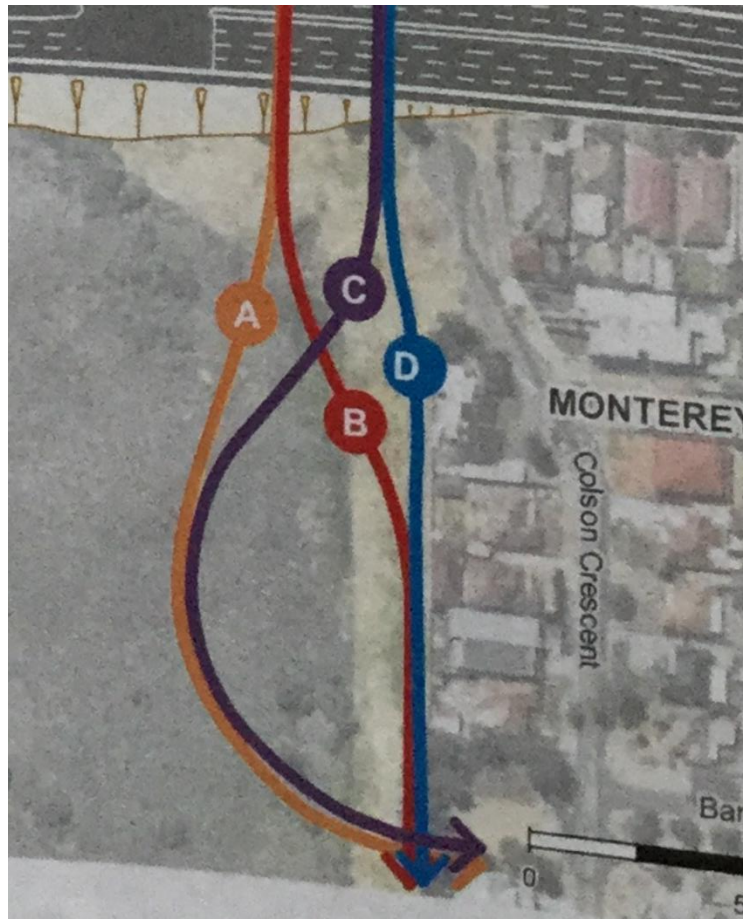
There were four options considered by the EIS for the eastern side which were I believe were more sensible. The following options were not considered:-

1. Keep the existing West Botany Road cycle way, cross President Ave at road level and build a shared Pathway along President Ave to North Scarborough Parklands. Build Pathway to join up with Eastern options A at ground level to avoid privacy concerns.
2. Placing a pedestrian bridge only over President Ave was not considered
3. Joining the bicycle path to other cycle ways within the Rockdale to increase connectivity with Kogarah Town or Brighton-Le-Sands.

Option A is the preferred route.

On evaluating the 500 community submissions, Option A is the most supported route. On reading the submissions, it is apparent that the community want to reach a destination on the eastern side.

**Figure 2 - Eastern routes for the Cycleway (Ref: EIS chapter 5, Figure 5-9)**



I have assessed the above Figure. The primary reason why the Eastern options were rejected by the RMS is because of privacy concerns for the residents near the proposed route. I have done a site visit on the Eastern side and have concluded the following:-

- Option A route is very far away from the one residential home in President Ave
- Option A at least 50 metres away from the five homes in Colston Crescent seen in the Figure 2.

Option A may visually impact 6 residential homes but this could be mitigated by excellent engineering solutions, such as a deeper S curve.

I do not understand why the same design principles to enhance visual amenity cannot be applied for the residents on Colston Ave.

## PIR does not address the Cumulative Effect of the EIS & PIR on the Patmore Swamp

Throughout the PIR, the reader is asked to refer to the EIS documents. The PIR and EIS are circular highly technical documents that are not easily understood by non-technical and untrained people. The PIR is a document that have been hastily put together making it difficult for the reader to work out what the extended share Pathway will look like.

Here is an example:-

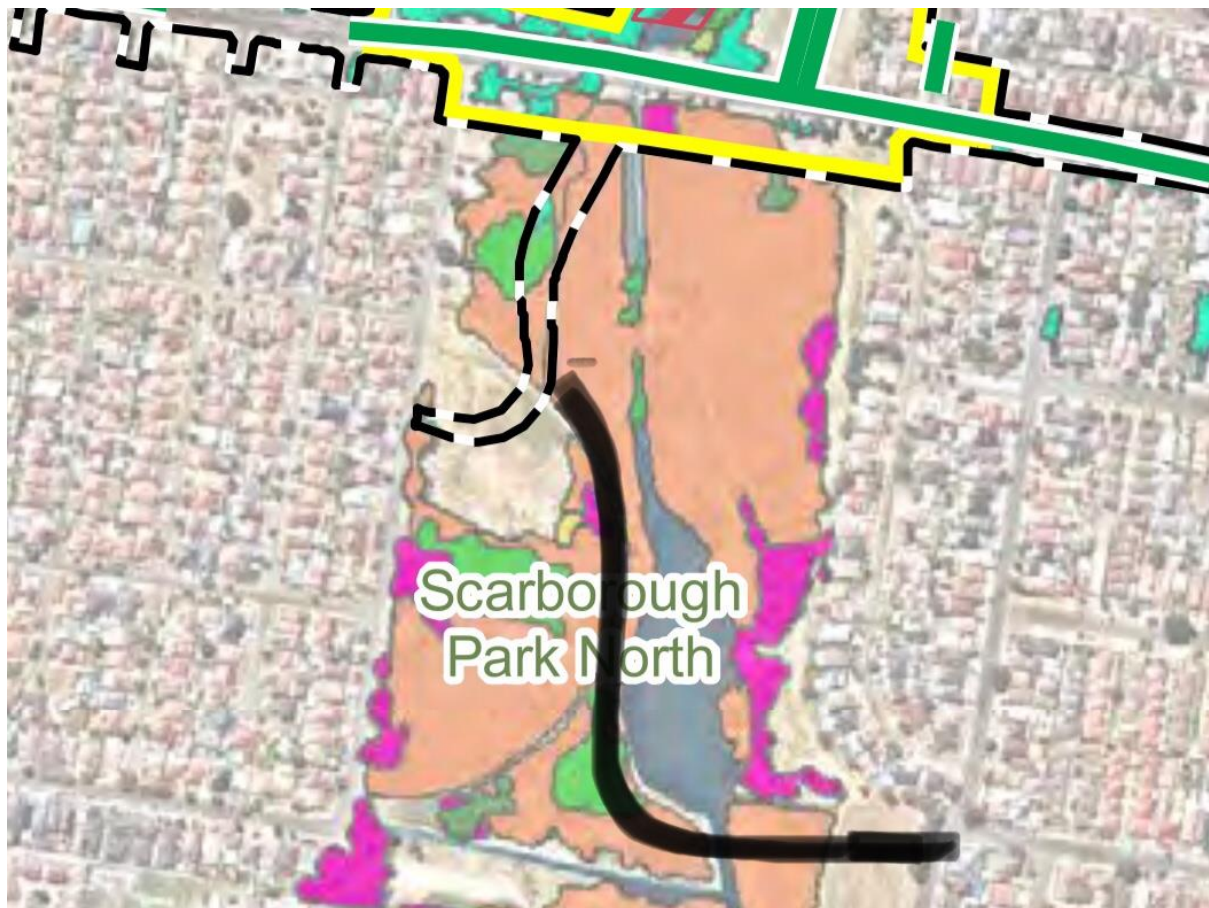
- 3 metre wide boardwalk (**3.2 - Description of Change p.12**)
- with hand rails and lighting (**3.2.1 - Construction activities p.13**)
- standing up to an elevation of 2.5 metres above the existing ground level (**3.4.6.4 Potential impacts –operation p.44**)
- including a one metre buffer either side of the existing pathway (**3.4.4.2 Existing environment p.37**)
- light poles off set one metre from path (**EIS 6.9.7 Lighting p.6.28**)

It took hours to work out the above details and it demonstrates why so many people in the community are unable to give a considered feedback on the PIR proposal.



The PIR (and EIS) dilute the changes made to the Patmore Swamp by dealing with impacts in a segmented way. I have attempted to demonstrate the cumulative impacts of both documents to illustrate the magnitude of the proposed change to Patmore Swamp. The figure below illustrates the cumulative changes to the Patmore Swamp:-

**Figure 3: Cumulative Impacts on Patmore Swamp (Source: EIS Chapter 12, Figure 12-2 – Native vegetation communities within the study Area, Page 12-13).**



Please refer to Figure 5-9 for the classification colour of each vegetation type.

When I look Figure 3, it does appear that the RMS have **targeted all EEC** within Patmore Swamp. The proposed route goes through the EEC instead of planning the route around this endangered vegetation.

Here is my evaluation of the cumulative impacts of the EIS and PIR on Patmore Swamp:-

#### Road Widening of President Ave & Pedestrian Bridge and Shared Pathway

- Loss of 30 metres of Patmore Swamp
- Loss of Coastal Freshwater Swamp Forest (PCT 1232). The reader of the EIS is not able to quantify the loss of PCT 1232 in Patmore Swamp as the EIS places this loss of vegetation in with the loss in Bicentennial Park. This loss is less than 0.47 hectares
- Loss of Common Reed (PCT 1808) – 0.77 hectares

“Impacts to Patmore Swamp include the acquisition of a 30 metre strip along the frontage of President Avenue for the upgrade of President Avenue. A shared cycle and pedestrian bridge would also be constructed over President Avenue. A shared cycle and pedestrian pathway would extend from the shared cycle and pedestrian bridge and continue south through Patmore Swamp and would link up with Civic Avenue near Annette Avenue. This section of the shared cycle and pedestrian pathway would need to be raised above the current ground level of Patmore Swamp. In all, the shared cycle and pedestrian pathway would be approximately 150 metres long and up to six metres at its widest point through the swamp. The construction of the shared pathway would include the removal of the existing vegetation” (Ref: EIS Page 19-14)

**Table 1: Summary of Endangered Ecological Communities within the Assessment Area- EIS.**

Type	PCT	Biodiversity Conservation Act listing status	Vegetation Integrity	Biodiversity credits	Development footprint	How much will be left?
Swamp Oak Floodplain	1232	Endangered	Moderate to good	8	0.47	0
Common reed	1808	Endangered	Moderate to good	8	0.77	0
				26 (total)		

The EIS states the first phase would impact on 4% of the Patmore Swamp.

#### Extension of Shared Pathway

- Loss of Coastal Freshwater Swamp Forest (PCT 1232). -0.22 hectares
- Loss of Common Reed (PCT 1808) – 0.20 hectares

**Table 2: Summary of Endangered Ecological Communities within the Assessment Area - PIR.**

Type	PCT	Biodiversity Conservation Act listing status	Vegetation Integrity	Biodiversity credits	Development footprint	How much will be left?
Swamp Oak Floodplain	1232	Endangered	Moderate to good	0	0.22	0
Common reed	1808	Endangered	Moderate to good	2	0.20	0

## Patmore Swamp not clearly defined in Preferred Infrastructure Report

It is critical to understand the exact size of the Patmore Swamp so that the reader is able to determine what proportion of the swamp will be effected by the EIS and PIR. It is difficult to assess the impact on the Patmore Swamp when the definition of the location of the infrastructure is not defined correctly.

The Patmore Swamp is located in Lot 1 of DP 1113262. The Submissions report states that “The total area of Patmore Swamp heritage listing is **around** 262,020 metres squared”. According to the Native Vegetation Regulatory Map Lot 1 DP 1113262 is 184,722.43 metres squared. This is a difference of 77,298 metres squared.

Has the RMS included DP 1177511 to calculate the denominator? If yes, I believe this is incorrect.

**Figure 4: DP 1113262, Vegetation Regulatory Map**



The EIS states the impact of the Road Widening will only take 4% of the Patmore Swamp. I think this is misleading of the RMS has not defined the denominator which is the total area of the Patmore Swamp.

The PIR does NOT state what proportion of the Patmore Swamp will be impacted with the extended pathway proposal.

I ask the Department of Planning and Environment to review the cumulative impacts on Patmore Swamp and not to review the extended Shared Pathway in isolation

## Biodiversity

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### Failure to recognise the Patmore Swamp as an Ecological Endangered Community (ECC) – Sydney Freshwater Wetlands by the EIS – it is illegal to proceed!

Dr Arthur White is a well-recognised local Wetlands expert. In his submission (#00197) in December 2018 he notes the following:-

- The southern side of President Ave (known as the Patmore Swamp) is an ECC- Sydney Freshwater wetland in the Sydney Basin Bioregion
- By not recognising the ECC, the EIS have not made an attempt to identify significant impacts (via a seven part test) and to propose amelioration measures to offset the impacts.
- “At present there is only a flood management strategy and no amelioration proposals or restoration proposal for the freshwater wetland. Patmore Swamp is an ECC and to proceed further without these measures would be illegal”.

The EIS focused on the northern side of President Ave and has largely ignored the impacts on the southern part of President Ave, known as the Patmore Swamp. Throughout the Preferred Infrastructure Report, there are constant references back to the EIS however no new work seems to have been performed to address Dr Arthur White’s concerns.

The extension of the shared bicycle path should NOT proceed without a 7 part test in accordance with NSW legislation. I do not think it is prudent of the Department of Planning and Environment to approve the pathway without balancing investigations based on site specific evidence within the southern section of President Ave.

I believe that the Department of Planning and Environment should not expose itself to legal challenge because the correct process has not been performed within Patmore Swamp.

## Southern Extension of Bicycle Path will destroy more ECC in Rockdale

The cost of building a cycle pathway and yet another further extension will result in more local Endangered Ecological Communities being destroyed.

Table 1 lists the loss of ECC lost the following in Bicentennial Park and the Shared Pathway/Pedestrian Bridge as a result of the F6 Projects.

**Table 3: Summary of Endangered Ecological Communities within the Assessment Area at Bicentennial Park.**

Type	PCT	Biodiversity Conservation Act listing status	EPBC Act	Vegetation Integrity	Biodiversity credits	Development footprint	How much will be left?
Swamp Oak	1232	Endangered	nominated	Moderate to good	8	0.47	0
Swamp Mahogany	1795	Endangered	Not listed	Moderate to good	10	0.30	0
Common reed	1808	Endangered	nominated	Moderate to good	8	0.77	0
					26 (total)		

The PIR details two additional Endangered Ecological Communities in the Patmore Swamp that will be removed if the Extension of the cycle way is approved:-

**Table 4: Summary of Endangered Ecological Communities within the Assessment Area at Patmore Swamp**

Type	PCT	Biodiversity Conservation Act listing status	Vegetation Integrity	Biodiversity credits	Development footprint	How much will be left?
Swamp Oak Floodplain	1232	Endangered	Moderate to good	0	0.22	0
Common reed	1808	Endangered	Moderate to good	2	0.20	0

My community will lose a total of 0.97 hectares of Common Reed and 0.69 hectares of Swamp Oak if the extension is approved. For this loss, my community is given 18 Biodiversity points. The loss of the reedland should be considered as a cumulative loss of both the F6 freeway and the Cycleway extension. To view the loss of ECC of the extension of the cycle path alone is misleading and understates the total loss to the community.

The impact on the biodiversity is simply unfair and unacceptable. The PIR proposes more loss of Common Reedland and Swamp Oak for a proposal that is outside the scope of the F6 and for a bicycle path that the community does not want!!!!



## Impact on the protected Fauna

### PIR & EIS Construction activities will endanger our Key Fish habitats

I believe that the EIS did not adequately address the impact of the bicycle path on the Fish Habitat and that the PIR has also ignored this risk. The PIR relies on EIS data for the aquatic assessment of the Patmore Swamp. The aquatic assessment performed in the EIS only evaluated Patmore Swamp within 10 metres of President Ave. The aquatic assessment did not review where the new bridge will be located. The proposed extension of the cycle path places more risk to our protected Key Fish Habitat in North Scarborough Ponds.

According to EIS, the Key Fish Habitat is located 800 away from President Ave (REF: EIS, Chapter 12, p21). On page 12 of the PIR, the Cycle path will be extended a further 600 metres in a southward direction towards the Scarborough Ponds. A simple calculation suggests the proposed bridge will be built less than 100 metres from the Key Fish Habitat in North Scarborough Ponds.

The EIS also provides details of the construction road that will be required so that the pedestrian bridge and cycle path can be built in the Patmore Swamp.

*“In order to construct the bridge it would be necessary to provide a temporary access road as well as a series of working pads within Scarborough Park North in an area that is inundated by floodwater that surcharges to Scarborough Ponds during storms. The inundation of the access road and working pads by floodwater has the potential to cause the transport of sediment and construction material into the receiving waterways...”* (EIS Ref: Chapter 18, page 18-24)

The PIR lists more Construction activities including:-

- Installation of the bridge and footing piers
- Installation of boardwalk
- Construction of a temporary road to allow bridge and pathway to be built.

The EIS & PIR has not addressed site specific risk of polluting our waterways during the construction phase of each project. I believe there is a high contamination risk of polluting our waterways during the construction phases and risking the Key Fish Habitats less than 100 metres away.

### Turtle Habitat at risk

There are large populations of native turtles within the Rockdale Wetlands including Bicentennial Park & the Patmore Swamp. Removing the common reedland and making the Patmore Swamp a construction zone will severely impact on the native turtle population. Turtles who call Bicentennial Park home will be fleeing south via the turtles stairs and culvert under President Ave. If this proposal is approved the native turtles will find Patmore Swamp not a sanctuary but a construction site.

As a local wildlife rescuer and carer of native turtles, I find this idea very distressing.

## Southern Myotis (Fishing bat)

The PIR relies on the EIS for any effect to the fauna. The EIS details the information about the Southern Myotis but this data is incomplete:-

- In Appendix C on page 87, the EIS states that Southern Myotis has been sighted at Patmore Swamp.
- The Southern Myotis is known to live in culvert and pipe under President Ave. This culvert will be destroyed and no longer be available as habitat.

The EIS and PIR does not detail the following:-

- Arboreal species such as Southern Myotis Bats roost in the Swamp Oak. Southern Myotis Bats are known to be a species dependent on tree hollows. (Ref: Preliminary Draft Conservation Advice of Coastal Swamp Oak of NSW and South East Queensland Ecological Community, OEH).
- According to Federal Department of the Environment and Energy, the Swamp Oak Ecological community provides a diverse habitat for a wide range of local fauna including the Southern Myotis

Southern Myotis have been sighted in Patmore Swamp and have foraging and roosting in the Endangered Ecological Communities. If the Endangered Ecological Communities are removed, the Southern Myotis will also not return to our wetlands.

There was incomplete data in Appendix H, Annexure A – Habitat Assessment Table was available for the Southern Myotis. The likelihood of occurrence for this species was “TBC”.

What are the outcome of this study and when will it be made available to the community post-EIS.

It is clear to me from my literature search that there has been no site specific data used to assess the Southern Myotis within the Patmore Swamp.

The PIR has not address the Threatened Species in the Patmore Swamp.

I object any decision being made above tree removal in the Patmore Swamp until further site specific research about the Southern Myotis has been completed.



## Protection of all other native animals

As a wildlife rescuer and carer I find this proposal to destroy more wildlife habitat very distressing. There are very few places in our local area where these animals can go due to constant loss of habitat and overdevelopment. The F6 Freeway proposal will devastate the animals that call Bicentennial Park home. Bayside Council has the dubious distinction of having the lowest tree canopy cover in Greater Sydney Region at 13.7%.

The F6 project in Bicentennial Park will already destroy a huge amount of habitat for our local native animals. If the vegetation in the Patmore Swamp is also removed, the local animals will have even less habitat.

The PIR ignores the cumulative impact on fauna due to the extended cycleway. The cumulative biodiversity effects should be assessed with the biodiversity loss detailed in the EIS.

## Safety and Nuisance Issues with proposed extension of Shared Pathway

The PIR does not address the remoteness of the proposed extension of the shared pathway. I believe the route proposed by the RMS has many community safety issues when compared to alternate routes proposed in the EIS (Option A, B, C and D- on the Eastern side). On the Eastern side the cycle way routes back onto homes on Chuter Ave which would make community members like myself feel more secure. This is acknowledged in the EIS when it is stated “. The visibility of the track from the street is limited, potentially giving rise to safety and nuisance concerns.” (Ref: Appendix C1, page 90).

The RMS details how trees will be planted around the boardwalk so that the new infrastructure will blend into the landscape. In such a remote location like the Patmore Swamp this may exacerbate the community safety issues.

The RMS has also stated that they will place interpretive signage along the boardwalk. If the boardwalk is too remote, this will lend itself to increased risk of vandalism.

The proposal for a pathway shared by cyclists and pedestrians also has safety implications. The proposed 3 metre width will not allow separation of cyclists and pedestrians. I note concerns about pathway width and separation have been raised by Bayside Council and bicycle user group submissions in the interests of user safety. Pedestrians wishing to walk slowly or stop to enjoy the view or read interpretive signage will be disadvantaged or put at risk by speeding cyclists. Many dog owners use the current grassed walking paths within the swamp. Will dog walkers be able to use the raised boardwalk? Dog walkers and cyclists are not a good mix!!

I believe that the proposed southern extension has real safety and nuisance concerns due to the remoteness of the route. I call on the Department of Planning and Environment to advise the RMS to find another route for the cycle way.

## Patmore Swamp – a memorial to a local young man

Several years ago a young man drove at night through the Patmore Swamp and drowned in the waterway. Immediately after his tragic death, his family and friends created a monument at the edge of the Patmore Swamp. This memorial is regularly attended to by loved ones and the local community have respected this memorial for many years.

**Figure 5: Memorial at edge of Patmore Swamp**



What does the RMS plan to do with this memorial to a local young man who lost his life at the Patmore Swamp?

## Do not destroy our heritage listed Patmore Swamp!!!!

I strongly object to a bicycle path being built through heritage listed Patmore Swamp.

Patmore Swamp is acknowledged by the Department of Environment and Heritage as “Aesthetically significant as a landscape of high visual amenity contrasting with surrounding suburbs” (NSW OEH 2010) (EIS Ref: Appendix C2, page 5-3). Rockdale council considered the wetlands to be of “high visual quality” particularly appreciated when “travelling along President Ave”. (EIS Ref: Appendix C2, page 6-10)

Patmore swamp is a locally listed heritage landscape in the northern part of Scarborough Park. The EIS and PIR has totally underestimated the heritage and environmental significance of this area.

It is important to understand that Patmore swamp originally extended north as far as Bay Street until reclaimed for Bicentennial Park in 1988. The important Kings Wetland is a remnant of the original northern section of Patmore Swamp.

**It is critical to understand that much of the original ground level of Patmore Swamp has never been disturbed or reclaimed whereas Scarborough Park and Bicentennial Park have had the landscape altered through reclamation.**

Patmore Swamp has managed to stay relatively intact since the arrival of the First Fleet. Patmore Swamp is a good example of what the landscape looked when the First Fleet arrived over 200 years ago. The history of the Patmore Swamp is understated in the EIS. There is no mention of the how the swamp lands were called “Green Meadows” by Captain Cook in 1770 and there is no mention of the Moorefield Racecourse.

The RMS response regarding the Moorefield Racecourse on page C18-2 of Part C –Response to Community Submissions simply does not make sense. Please refer to community submission #00236 to clarify this error. This continues to illustrate to me that the “experts” who have been hired by the RMS do not understand the local history of our area and therefore are unable to impart the important significance of the Patmore Swamp.

The pedestrian bridge which will be 150 metres long and the extended pathway over 600 metres long will detract from the peaceful setting of the swamp lands. Thirty metres of the Patmore swamp is already being taken for the widening of President Ave and this Bicycle Pathway will result in the loss of more open green space. The proposal of the southern extension to take even more of Patmore Swamp is not acceptable.

The RMS have proposed interpretive signage of the heritage in Patmore Swamp (Refer to Part D – Environmental Management Measures, Page D1-18). To place interpretive signage after the aesthetically significant landscape has been destroyed is a massive insult to the community. If this project is approved, please do not insult me further by placing plaques to remind me what I have lost.

## Viewpoints give biased view

The PIR does not present a realistic picture of the new extension will look like. There are no artistic impressions so that I can visualise what boardwalk and new bridge will look like within the landscape. The PIR has commentary on viewpoints and I believe misleads the reader into thinking Patmore Swamp is primarily parklands. As can be seen easily in Figure 7 of this submission, Patmore Swamp consists of the Reedland and other wetlands vegetation.

### Viewpoint 10 from the EIS

PIR viewpoint 10 did not address the true visual impact of the Bicycle Pathway. Viewpoint 10 does not reflect the side elevation of the pathway which will have a significant effect on the viewpoint sensitivity and magnitude of change. This viewpoint documented in the EIS would show the bicycle path in a favourable light and I do not agree with this assessment.

I suggest that the viewpoint 10 be change to “View East from Civic Ave at Annette Ave and an additional viewpoint be added – “View west from pathway adjacent to drainage channel within Patmore Swamp”. This will show the bicycle path in a more realistic light.

Viewpoint 10 is no longer valid as it does not assess the junction of the two 5 metre paths.

### Viewpoint 16 from the PIR

Viewpoint 16 misleads the reader into thinking the path will follow the existing path. I would like highlight the following discrepancies:-

- According to the Department of Primary Industries (2012) Guidelines for riparian corridors on waterfront land, the path must be built 20 metres away from the riparian edge.
- The PIR author notes North Scarborough Park, not Patmore Swamp. Very confusing for the reader!!!
- The comment “some vegetation clearing” – this statement underestimates the significant vegetation loss.

I disagree with the description of the viewpoint and finding. The description does not align with the descriptions of the proposed shared cycle and pedestrian pathway scattered throughout the Preferred Infrastructure Report. The proposed pathway will be a 3 metre wide boardwalk with hand rails raised at an elevation up to 2.5 metres above the existing ground level with lighting and a one metre buffer either side

In this view the shared pathway exiting at Civic Avenue would sweep across in the forefront of the view. The raised boardwalk would be seen coming in from the left and entering the vegetation to the south. The raised boardwalk will not be “in keeping in character with a developed parkland setting” due to its elevation and visual prominence in the landscape. The visual integration of the boardwalk into the wetland setting by new plantings will most likely not occur so as to provide better visibility of the raised boardwalk from the street due to security concerns. The vegetation to the north (left)

would be removed as it will be in the way of the raised boardwalk. Some of the vegetation to the south (right) of the view may also be removed due to security concerns.

I assess the magnitude of change in this case as being “High” visual impact rather than “Low”.

#### Viewpoint 17 from the PIR

I disagree with the description of the viewpoint and finding. The finding in this viewpoint is incorrect as it is a cut and paste from the entry against the previous viewpoint 16. There will be no curve in the cycleway at this point. The bridge over the waterway will be visible in the background. A raised boardwalk will lead directly from the bridge through the reedland visible in the centre of the view. The raised boardwalk would gradually lower to meet the grass level and travel straight through the middle foreground to Chuter Avenue.

I assess the magnitude of change in this case as being “High” visual impact rather than “Low”.

At night the bridge and raised boardwalk would be brightly lit to a high level as recommended in the Australian standard due to security and safety concerns. The bridge and raised boardwalk would stand visually prominent in an otherwise dark landscape.

I assess the magnitude of change in this case as being “High” visual impact rather than “Moderate-low adverse”

The viewpoints are very misleading and inaccurate information to the reader. The viewpoints need to be reassessed with the idea the proposed pathway will be a 3 metre wide boardwalk with hand rails raised at an elevation up to 2.5 metres above the existing ground level with lighting and a one metre buffer either side

The extension of the pathway is a bolt –on to the EIS and is OUT OF SCOPE. Our heritage should not be sacrificed for a bicycle path the community do not want!

## Alternative Viewpoints

I wish to nominate two alternative viewpoints to those illustrated in the PIR, which I have identified as 16A and 17A. I believe these views illustrate the cumulative magnitude of change (16A) and the magnitude of change on the freshwater wetland (17A)



**Figure 6: Alternative viewpoint 16A.**

The above view adopts a similar position to viewpoint 16 however the viewer is facing north. This view shows the junction of the raised boardwalk with the shared pathway ramp leading to Civic Avenue. This viewpoint also illustrates the cumulative impact of the option E western route and southern extension.

I assess the magnitude of change in this case as being “High” visual impact
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**Figure 7: Alternative viewpoint 17A.**

The above view is from the eastern side of the freshwater wetland in Patmore Swamp looking west to the opposite bank. The raised boardwalk will emerge from the vegetation on the north side (right). The raised boardwalk will be visually prominent as it follows the pond's western bank and then rises over a bridge crossing the channel to the south (left). Most of the Coastal Freshwater Swamp Forest visible on western bank running from the centre of the photograph to the north will have been removed as the path will be more than 20 metres from the bank so as to comply with NSW Department of Primary Industries (2012) Guidelines for riparian corridors on waterfront land.

I assess the magnitude of change in this case as being "High" visual impact

## Soil Contamination

I was very disturbed to read the section of Soil Contamination in the PIR. The proposed works would risk acid sulphate soils, pesticides and unknown fill into the waterways.

The RMS are asking our community to accept that a study will be done and the experts will take care of our wetlands. On reading the EPA submission attachment 1 which was highly critical of the RMS methodology, my faith in the RMS experts has been severely diminished.

There is only bore hole (BH 1214) that is located in Civic Ave near the proposed extension. This bore hole analysis was not used to assess the soil contamination. The RMS are making decisions on data that does not exist.

The EPA considers that there may be impacts associated with previously landfilled waste at Scarborough Park. Impacts may include air quality impacts, odour, exposure of leachate and gas, and uncovering of classified/unknown wastes. I do not think the extension of the cycle way is worth the risk to our community or our precious wetlands.

The PIR did not address this very critical issue of soil Contamination.

I do not think it is appropriate to make a decision about this extension unless the specific site soil contamination data is available.

Our wetlands are not worth risking for a proposal that is out of scope of the F6 projects for a cycle way the community does not want.

## Surface Water and Flooding Risks

I think it very dangerous to build a cycleway through the Patmore Swamp. The boardwalk will have to be very high so that the boardwalk is not flooded each time it rains. The PIR estimates up to 2.5 metres high.

The PIR did not address this very critical issue of flooding.

I do not think it is appropriate to make a decision about this extension unless the specific site data is available to make this decision.