



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**

Mr Rob Stokes, MP
Minister for Planning
52 Martin Place
SYDNEY NSW 2000
24.1.2017

Dear Minister,

The Society understands that the State government is considering a review to improve the Environmental Impact Assessment process for State Significant projects in NSW. Whilst we have missed the deadline for submissions we are sending through this letter to your office.

Our members welcome this review if it is a genuine review to improve the process of assessing the impact of large developments on the environment. We are a local conservation group established in 1966. We have a close association with the Field of Mars Reserve, East Ryde, a 50 hectare natural bushland remnant. Fifty years ago this bushland remnant was under threat from a proposal by Council to expand the small garbage tip area in the reserve. Due to the Society and local community's efforts the Field of Mars Reserve is now a Wildlife Refuge and contains the award winning Field of Mars Environmental Education Centre visited by over 15,000 students each year.

Our local area has had a series of major infrastructure and significant residential developments nearby which can have the regional effect of leaving the Field of Mars Reserve an isolated bushland remnant if the EIS process is unable to capture cumulated impacts of major development on a regional scale.

This significant development, all of which the Society has forwarded submissions at the environmental planning and assessment stage, has included:

- M2 Tollway,
- CSIRO site development;
- Chatswood to Parramatta/Macquarie Park rail link;
- Lane Cove Tunnel and associated road widening works;
- Widening of the M2 Tollway;
- M2 Surplus lands high rise development (between Delhi and Wicks Rds);
- Private land plus M2 Surplus lands high rise development (along Delhi Rd);
- Expansion of Macquarie Park cemetery;
- Major development within Lane Cove Council area along Epping Rd.;
- Ausgrid major cable upgrade (current).

Further, the Field of Mars Reserve has been identified as part of Sydney's Green Grid in the draft Greater Sydney Commission's plan for growing Sydney. The government has committed to a strategic planning approach via the establishment of the GSC and it is critical that future major development is consistent with an over arching strategic planning framework including an integrated transport planning strategy.

From our experience we would have major concerns with the current EIS process. In summary these concerns include:

- Imbalance between the protection of the environment and the interests of more powerful government or private developer pressure in the approval decision making;
- Independent facilitators and specialist consultants are not always independent;
- Community consultation which is not always genuine - either preliminary consultation effectively "controls" any future decision making process ie legitimate community concerns are pre-empted or post consultation occurs after the core planning decisions have been made;
- Proponent is sometimes the consent authority;
- REFs need improved scrutiny also;
- Lack of rigour including good community consultation in consideration of the various possible options for delivery of a major transport/infrastructure project;
- Supporting documents to the EIS are poorly labelled and difficult to access - there is no consistency in how documents are presented;
- Landscaping plans that include a component of native vegetation restoration is at the end of the project so that seed collection, propagation etc is left to last and re-plantings not always local indigenous;
- Landscaping often not sensitive eg the recent planting of exotic trees on the M2 site high rise in North Ryde, a site with adjoins endangered shale forest (Bundara Reserve);
- Political process can over-ride genuine consideration of the environmental impact of a proposal in a holistic sense - eg the decision to under ground the Parramatta to Chatswood rail link was not based on any genuine environmental assessment;
- Lack of independent monitoring and reporting as a requirement in the approval conditions and no effective action taken on any alleged breaches of consent conditions - often EIS does not address how compliance is to be achieved in a practical sense eg M2 Tollway construction resulted in some serious pollution breaches;
- Community consultative committees established during project development and construction as a condition of consent are unable to operate independently and transparently - committee representatives are mostly "hand picked", interaction between the community representatives is sanctioned by the facilitator, minutes are sanitised, agendas/discussion controlled, meetings are controlled by lengthy introductions with flashy power-point presentations;
- Ecological assessments are often inadequate and use out dated information and limited local consultation utilised in their preparation;
- Ecological assessments often lack capacity to capture the regional and corridor impacts of a development;

- Cumulative impacts especially on waterways and air quality are unable to be considered well in the current approval process - some of this is because of poor strategic planning and inconsistency between Council areas in how they have developed strategic documents such as Biodiversity plans, catchment protection plans etc;
- Points raised in community submissions are often ignored or dismissed and there is little opportunity for the community to respond. As part of the consultative process to specific points that they feel have been over looked or misinterpreted by the consent authority.

Overall we are cynical and concerned that the current EIS process fails The EIS process for major projects needs to complement good strategic planning documents whether this be for integrated planning for transport, air quality, catchment health, biodiversity protection.

Yours sincerely,
Cathy Merchant,
Committee Member