



Department of Planning and Environment  
320 Pitt Street  
Sydney NSW 2000

17 October 2018

**Draft Marsden Park North Precinct Plan**  
– **Submission of Blacktown & District Environment Group Inc**

I herewith lodge the submission of Blacktown & District Environment Group Inc on the subject matter. The submission will address certain points of concern.

**DEVELOPMENT – A TOOL FOR DESTRUCTION**

It is a pity that the NSW Government has built its economy on development and much of that development being on the Cumberland Plain of Sydney.

We note that a certain degree of consideration is given to conserving natural areas in development decisions. However, on the Cumberland Plain, the concessions to conservation can readily be observed as tokenism and not conducive to sustaining the little extent of fauna species which have tenuously recovered populations despite a history of their species having been subject to determined human exercises of extermination.

Sadly, areas which have been a resort for fauna species, such as Marsden Park North Precinct, have thus far been devoid of expansive housing industrial, commercial or infrastructure development but they are now areas the target of wide scale vegetation clearing, replacement with brick, bitumen and concrete followed by constant and quantitative human activity.

What could be a compromise accommodating development and preservation of viable populations of our natural heritage of the Cumberland Plain is too far tilted to the interests of development. The consequence is that the all too little signs of recovery of fauna species on the Cumberland Plain, particularly macrofauna, is about to be reversed and extinguished if the present development direction is maintained.

We wish that more extant remnants of intact bushland were retained in the Marsden Park North Precinct than what is proposed. All the science points to extant bushland performing greater ecological function than revegetation exercises (see Curran *et al* 2014 for an example).

It is the present generation of planners and elected government representatives who will be assessed one day as to whether they were the cause or the avoiders of flora and fauna extinctions on the Cumberland Plain.

**SOUTH CREEK FLOODING**

On this matter we suspect we will be repeating cautions from other individuals and government agencies.

We are mindful that one land owner sought to develop on the floodplain of South Creek from north of Richmond Road but the Draft Precinct Plan proposes zoning the floodplain as “Rural Transitional”. What is not clear from the wording of the Draft Development Control Plan which, on the one hand, prevents development on the floodplain but, on the other hand, seems to permit development via filling the floodplain if certain

guarantees are met.

To allow that desire of the land owner to remain under temptation is to court disaster.

The site of the former St Phillip's Church of England, Marsden Park has a history testifying to the folly of developing on the floodplain of South Creek and the wilful negligence of pushing flood effects onto property owners elsewhere by filling the floodplain at Marsden Park North.

Pages 8 (and adjoining page showing a picture of the church building) and pages 12 to 14 of the attached pdf version of Jan French's 1988 book "Clydesdale" are noteworthy in that Jan records the serious flood effects which can occur from recurring floods in the Hawkesbury-Nepean Region and, more specifically, South Creek, Marsden Park North.

It is the responsibility of the NSW Government today to prevent the ill consequences of building on the floodplains of the Hawkesbury-Nepean Region. Nothing has changed, the early Governors of the Colony had to issue instructions/orders to prevent settlers erecting buildings too close to river/creek margins because of the observed serious flooding which can and did occur.

Please, remove any tempting clause in the Development Control Plan suggesting the existing land owner can mount a case, speculative as it will ultimately be, to permit the filling of the floodplain of South Creek, Marsden Park North. The consequence can be disastrous for other land owners, their lives and properties, elsewhere in the Hawkesbury-Nepean Region if flood storage capacity is affected elsewhere. Not even the proposed raising of the Warragamba Dam wall is a foolproof solution. When extensive rain inundations in the Sackville Gorge catchment occurs and 'conspires' with rain inundations elsewhere in the Hawkesbury-Nepean Region the consequences are tragic.

## **RIVERSTONE WETLANDS**

The decision of Biodiversity Certification of the Sydney Growth Centres (including the Marsden Park North Precinct) was based largely on a desktop review of the environment. Expediency has therefore superseded scientific analysis, ground-truthing and environmental sensitivity. Most of the land clearing facilitating development of the Growth Centres thus far has occurred without realistic analysis of what flora and fauna has been lost.

With respect to the ephemeral Riverstone Wetlands ground-truthing has occurred by both community observation and scientific analysis. What has been observed as reality could not have been imagined when Biodiversity Certification of the Riverstone Wetlands was devised and approved.

That which has since been observed as reality (although some parties have known prior to that) is that Riverstone Wetlands plays host to a wide diversity of migratory shore birds which the Australian Government has obligated itself to protect through international agreements including JAMBA, CAMBA and ROKAMBA. That happens after rain events provide sufficient water to fill the wetlands to bird wading level. The attached brochure identifies bird species observed at the Riverstone Wetlands over time. Note that not all birds listed are migratory shore birds but more than sufficient are to warrant special consideration toward preserving the Riverstone Wetlands.

Added to that is the finding of a population of Green and Golden Bell Frog through scientific study of the Riverstone Wetlands.

Biodiversity Certification of the Growth Centres recognises the potential to find this NSW BC Act and Commonwealth EPBC Act listed species in the Riverstone area but mistakenly confines the area of potential finding to an area south-east of the Riverstone Wetlands. Biodiversity Certification of the Growth Centres provides for protection of the area of finding of the Green and Golden Bell Frog in those other Riverstone areas as first priority. Surely, the finding of this population in the Riverstone Wetlands warrants the same preservation consideration as the other areas. Is conservation about preserving the species or a locale?

At stake here is what side decision makers are taking with respect to this matter. Are they for Australia and its natural heritage or are they on the side of an overseas money making venture? Is today's generation a 'sell-out' of Australia and what makes Australia distinct or is today's generation a continuation of the heritage of our past.

We are critical of any proposal to create a wetland of sorts in the floodplain of South Creek. This experiment is not founded on science i.e. observational science. It is founded on philosophy and that philosophy driven by expediency to serve development interests and those development interests having their roots overseas.

South Creek is inhabited by the introduced fish species *Gambusia*. As soon as a flood event occurs in South Creek and it breaches its bank into the "wetlands of sorts" the *Gambusia* will inhabit the area and consume the Green and Golden Bell Frog tadpoles after they leave the egg. Even if the government successfully translocates the population of Green and Golden Bell Frog to the created "wetlands of sorts" (and that is a risky proposition) the population will not regenerate because offspring being picked-off by *Gambusia* at tadpole stage.

Further, the nutrient build-up as well as the invertebrate activity which has established over the decades in the Riverstone Wetlands cannot be recreated in the "wetlands of sorts" because the source is not the same. It is therefore pure speculation, and faulty at that, to presume the migratory shore birds will relocate themselves from the existing favoured wetlands to the created "wetlands of sorts" in the floodplain.

Stop and ask yourselves "Why aren't these migratory shore birds seen at the thousands of rural dams, creeks and other wetlands in Western Sydney except for Sydney Olympic Park and Pitt Town Lagoon?" The answer is that conditions are ideal where the birds presently inhabit and the thousands of other potential alternative locations are not. The government is proposing a fail when it suggests creating an alternative wetlands in the floodplain of South Creek.

The government must recognise that it is failing the environment in lying down and exposing its genitals to development interests. That it is doing so for overseas interests is as though the government and its decision makers are cutting themselves off from the spirit of the nation's forebears including those who went to the theatre of the Great War a century ago whereupon they demonstrated "*Whether from the city or the bush, the fighting men were deemed to have sprung from the soil of a distinctive land and had made it known to the world that this place produced the finest people in the world.*" Those forebears had a greater regard for preserving the nation's heritage than is evident today.

Fight! Damn it! Don't sell-out!

## **ABORIGINAL HERITAGE**

The Schofields, West Schofields, various Riverstone and Marsden Park Precinct Plans seek to fill largely with brick, bitumen and concrete an area which was perhaps the most profuse location of Aboriginal activity on the Cumberland Plain.

The experience of Colonial settlers and their progeny are well recorded and they describe the wealth of bird life in South, Eastern and Quaker's Hill Creeks. The bird life would have been abundant food source for Aboriginal inhabitants as would have been fish, other aquatic life and other fauna species, especially macrofauna as those species were also drawn to the water and the more lush vegetative pickings within that flood prone landscape.

Add to that the ready source of Silcrete for Aboriginal tool making on what is known today as Plumpton Ridge and you can see why archaeological digs turn up huge amounts of Aboriginal artefacts in the area of the aforesaid North-West Growth Centre Precincts.

It is not surprising that in the West Schofields Precinct exists a location known in the past, by map, as "Burial Ground of the Blacks". Do other early maps of the Sydney Region have such a notation?

Such conditions and observations of Aboriginal activity are affirmed somewhat by findings mentioned in the Aboriginal Heritage Study for the Marsden Park North Precinct Plan.

We don't know the specific location for most of the locations and how the government is proposing to recognise these and preserve those of significance.

We bring to your attention, however, a location of significance which we thought local Aboriginal groups had registered as AHIMS more than three years ago but it is not acknowledged as such in the Aboriginal Heritage Study.

We believe the location is opposite the intersection of Charlotte Street (a blocked off street) and Park Road, Marsden Park North. It is about 70 to 90 metres west of Park Road at this point. The location has 20 to 50 Silcrete boulders or cobbles with a extensive number of flakes/chips on the ground around those larger Silcrete deposits.

The location presents as having been, at some time in the past, an Aboriginal stone-working site.

As such it is worthy of conservation.

Additionally, there is an old growth *Eucalyptus tereticornis* tree presiding over the location. It is difficult to date the age of the tree but given the hardness of the ground in the area and the expectation that rain water drains off quickly, growth of the tree would have been slower than for other areas of the Cumberland Plain. Notwithstanding, the diametre of the trunk is such that it is not an exaggeration to confer a minimum age of 150 years for the tree.

As such, it is possible this *Eucalyptus tereticornis* tree once provided shade (at least as a sapling) when some Aboriginal forebears worked stone in the location.

We note the Draft Precinct Plan provides for a slither of E2 Environmental Conservation zone leading to a park west of present day Park Road. That slither may be near to if not accommodating the Aboriginal stone-working site. It is not clear enough to determine from the draft zoning map whether for certain the Aboriginal stone-working is protected by that zoning.

We therefore urge that the intended slither of E2 Environmental Conservation zone leading to a park west of present day Park Road, Marsden Park North incorporate the Aboriginal stone-working site in that area, retain the Silcrete boulders/cobbles and flakes/chips as well as the old growth *Eucalyptus tereticornis* tree.

## SUMMARY

An expansive Draft Precinct Plan for Marsden Park North is too much for our minimal resouces, relying on voluntary contributionas we do, to adequately assess. We have raised some points.

We would appreciate advice as to whether the Aboriginal stone-working site we refer to is protected.

We regard these points as of vital importance and ought to be accommodated if Ecological Sustainability is part of the NSW Government agenda.



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