Extracts from a letter from a Community aroup.

- Issues to be addressed by proponents in the EA.

Bevian Swamp and the southern road access



The document recognises the importance of Bevian Swamp (page 21):

"It is therefore concluded that the Bevian Swamp is of high regional significance due the listing as a SEPP 14 wetland and the diversity of habitat for flora and fauna present within this wetland."

However, it minimizes the assessment of the impacts. In particular the use of the old Bevian Road trail as the main southern access is totally unnecessary and inappropriate.

It is unnecessary because we are told that other less damaging access could be provided if the developers are willing to buy the land. The owner is willing to sell but the developers do not want to pay the price asked. The road access proposed by Marsim has a very high environmental cost which should be factored in to any decision the Department and Minister make about this proposal.



It is inappropriate because even with the road design as described by the developers there will have to be road widening and considerable cut and fill within the "buffer" and within the 7(a) zoned land (Environmental Protection – wetland). Such activity makes a mockery of the terms "buffer" and "Environmental Protection". There will not be enough room between the road and the wetland to effectively strip nutrients and sediments. If the alternative access location was used most of the current trail would be closed and sediment and nutrient input to the wetland could be significantly reduced.

In addition, to address long term access from the south, the road beside the Swamp would have to be significantly raised to allow for increased flooding due to faster run-off from an urbanized catchment and because of climate change predictions of increased intensity of storms.

The Department's Concept Plan Principles called for:

"generous buffers zones to be set based on the principles of protection and conservation of the environmental qualities of the wetlands and on mapping of existing ecological communities."

The **building** setback (not the lot setback) from the wetland is only 80m and the **building** setback from the Swamp Oak Forest is only 20m. This implies that the forest could extend onto the private lots.

m. Issues raised by the Department of Planning arising from assessment of previous development proposal on the subject site

The Concept Plans still do not address many issues raised by the Department. For example, perimeter roads appear on only part of the Plan.

(xviii) Potential negative impacts on Bevian Swamp.

The impacts will depend on the effectiveness of the Stormwater Management Plan which was not on display. As noted above, the access route beside Bevian Wetland is completely inappropriate and will not

"minimise the potential impacts on the Bevian Wetland ecosystem"

Some of the smallest lots are on steep land near the wetland in the south western quarter of the area. This will inevitable mean more intensive disturbance of the soil.

The Concept Plan says that roads will be designed without kerbs and gutters so roadside swales can be used. This may work for some roads but many of the shorter linking roads go across the contours and down significant slopes. The developers will need to address the risk of erosion/scour.

The **shopping centre** should not be located close to the wetland but towards the middle of the proposed development. The shopping centre is likely to be the largest generator of rubbish and pollution in the development based on experience elsewhere. Oil pollution from the parking areas also poses a risk to the wetland. It would also make more sense to have the shopping centre located where it is the shortest distance from the majority of the dwellings.