



Greenwich Community Association Inc

PO Box 5057, Greenwich, NSW 2065

For current committee contact details see www.greenwich.org.au

30 December 2019

The Executive Officer
Hunters Hill Lane Cove Parramatta Ryde BFMC
PO Box H4
Harris Park NSW 2150

Dear Executive Officer

Greenwich Community Association Inc - Submission Draft Hunters Hill, Lane Cove, Parramatta, Ryde Bushfire Risk Management Plan

Status of Greenwich Community Association Inc

The Greenwich Community Association (GCA) is a non-profit incorporated community association dedicated to gathering and promoting the views and interests of the residents of Greenwich. It was established over 70 years ago and has extensive experience in the planning issues affecting the community – see our website: <http://www.greenwich.org.au/>

GCA Submission

The GCA welcomes the opportunity to contribute to the development of the Hunters Hill, Lane Cove, Parramatta, Ryde Bushfire Risk Management Plan (the Plan).

This submission is aligned with the stated aim of the Plan which is to minimise the risk of adverse impact of bush fires on life, property and the environment by:

- reducing the number of human-induced bush fire ignitions;
- managing fuel to reduce the rate of spread and intensity of bush fires, while minimising environmental/ecological impacts;
- reducing vulnerability to bush fires by improving preparedness; and
- containing fires with a potential to cause damage to life, property and the environment.

The main sources of ignition in the area are deliberate ignitions, campfires, misadventure & lightning.

The GCA makes the following specific comments in relation to the Plan.

1. Omission of Viva Energy Gore Bay Terminal (refined product storage and distribution operation)

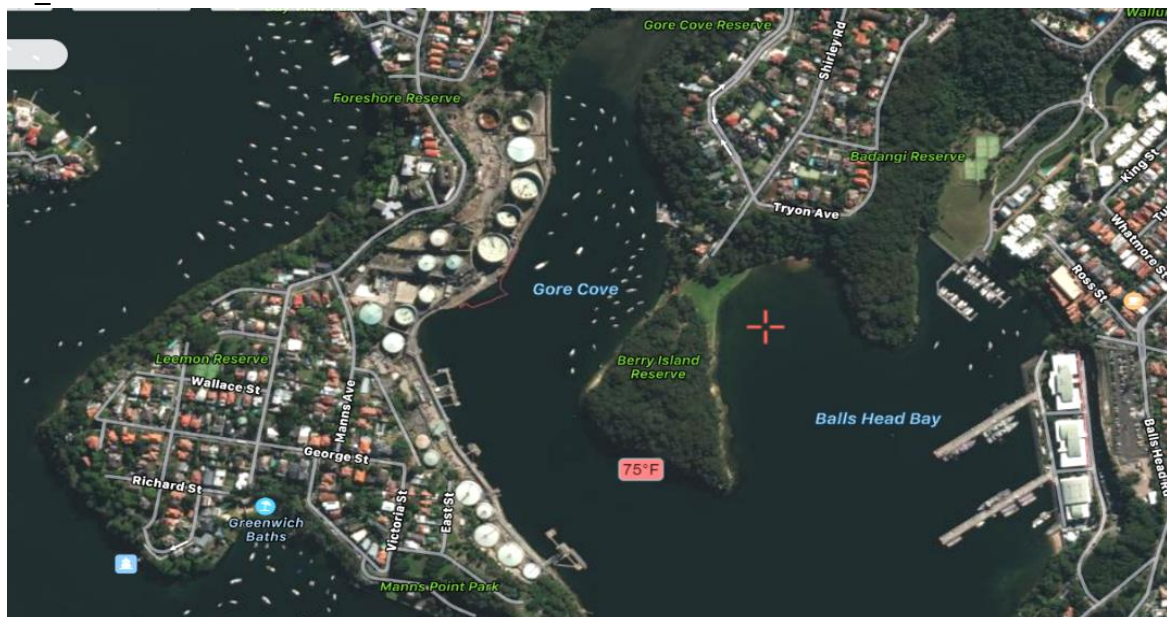
It is noted that just 3 locations within Greenwich are identified in the Plan with actions and accountabilities allocated, viz. Standish St, Greenwich Hospital and Valley View Rd (sic).

As can be seen in the Google map below, the Viva Energy terminal sits within and between a tract of bush land on both its northern and southern perimeters.

The lack of any reference at all to the Viva Energy terminal at Gore Bay, an operation in the heart of bushland and in close proximity to housing and recreation areas, is inexplicable, particularly when other less hazardous sites such as the Coal Loader, the NSW Fisheries Complex and HMAS Waterhen are specifically referenced in the *Mosman, North Sydney, Willoughby Bush Fire Management Committee Bush Fire Risk Management Plan 2017-2022* (refer Appendix).

It is also noted that the *Mosman, North Sydney, Lane Cove and Willoughby Local Emergency Committee* produced a plan, identifying Berry Island Reserve as having a risk score of 68.68%. Despite Lane Cove's participation in that committee, there is no reference to the risks Viva Energy Gore Bay operations.

The terminal's unique situation between bush land (that is tinder dry at the moment) warrants a plan that details accountabilities and actions for bushfire for the following reasons:



Strategic Site – close to 50% of NSW’s petrol stock is received at and distributed from this site.

The site services the marine fuel requirements of many vessels in Sydney Harbour. It also operates bunkering services for naval vessels – sometimes at berth at Gore Bay.

Hazardous Potential - all product handled is refined product. Diesel and marine fuel are stored at the terminal and petrol and jet fuel is pumped through a pipeline to Clyde. Whilst Viva Energy has stated that it is not currently storing petrol on site, this can be done without development consent once necessary modifications have been made to infrastructure.

Furthermore, jet fuel storage would be possible if development consent is granted.

National Fuel Security – if there is a large fire in the bushland that impacts the terminal operations, significant fuel security issues for NSW would ensue.

Infrastructure Security - Accessibility, Monitoring and Security - the Viva Energy operation takes responsibility only for fire management on its own site and within its own boundaries.

Since its transfer of effective control by Shell Australia, the site is staffed by a significantly smaller number of staff and does not have continuous electronic and/or active security on its boundaries nor the above-ground and accessible pipeline near Shell Park. This was confirmed in a recent community meeting with Viva Energy.

The entire Viva Energy operation is accessible by both land and sea.

- The bushland on the north boundary of the site can be accessed via Holloway reserve or via the recreational area near the boat ramp on the Wollstonecraft side of Gore Bay.
- The bushland on the south boundary is accessible via the Manns Point recreational area.
- The bushland on the eastern boundary can be accessed via Gore Creek Reserve.

Given its easy public accessibility, the Viva Energy boundary warrants 24-hour surveillance using modern technology such as thermal and electronic technology.

Furthermore, the product transfer pipeline in Shell Park is accessible as it is above-ground and is adjacent to significant amounts of dry combustible material.







The current bushland walking paths and recreation areas right next to the site are not managed by the Plan.

Given that 68% of fires in the area covered by the Plan are a result of human action, the GCA submits that:

- the level of security provided by Viva Energy over its operation must be reviewed, designed and audited
- access should be blocked to any site adjoining the Viva Energy site during total fire bans, for example, as is planned for in other sites
- the Plan must be amended to incorporate address bushfire risk to and from the Viva Energy operation, as has been done for specific sites in the *Mosman, North Sydney, Willoughby Bush Fire Management Committee Bush Fire Risk Management Plan 2017-2022*.

The Plan should be amended to provide appropriate protection to adjacent communities and recreational visitors to:-

1. include actions and accountabilities for Viva Energy and Government Authorities to manage bushfire risks;
2. inform and educate residents in the surrounding areas of the resulting actions, accountabilities and inspections; and
3. ensure that National Security Agencies are included in the assessment.

2. Lane Cove Bushland Park

The Plan makes reference to 'Valley View Road' – we think this should be Valley View Crescent. This area in fact borders onto Crowther Ave, Ronald Ave and Cogan Place.

The area was subject to a back burn ten to fifteen years ago which resulted in it getting out of control, loss of valued wild life and failure to achieve its objectives.

Much of the potential fire fuel in the area comprises dead trees and branches that have not been cleared, vines that are impacting on the trees and considerable dead leaves which could easily be cleared thereby reducing fire potential, without the need to undertake prescribed back burn in an area that is surrounded by residential houses.

This pocket of bushland comprises rainforest and wet sclerophyll vegetation. The enhanced humidity levels resulting from a rainforest environment help to protect this Bushland Park from fires.

Furthermore, Gore Creek, which flows through this reserve, includes over 20 species of holotype Hygrocybe, which are listed as an Endangered Ecological Community under Parts 2 and 3 of Schedule 1 of the Threatened Species Conservation Act. <https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/nsw-threatened-species-scientific-committee/determinations/final-determinations/2000-2003/hygrocybeae-community-of-lane-cove-bushland-park-endangered-ecological-community-listing>

The Hygrocybeae Community relies upon high humidity levels for survival. Prescribed burning in this area would put them at grave risk.

Adopting alternatives to prescribed burning would be more responsible in protecting the Hygrocybe, rainforest environment and wildlife. This would also eliminate human exposure to toxins from bushfire.

For the above reasons, the GCA submits that the Plan be amended to:

- adopt more ecologically and environmentally responsible actions to deal with bushfire risk in the Lane Cove Bushland Park, given the confined composition and locations of bushland, along with the desire to protect the wildlife
- ensure that the same principles apply to other roads adjoining the park (Crowther Ave, Ronald Ave and Cogan Place).

We welcome the opportunity to discuss our submission with you in detail.

Yours faithfully

Merri Southwood
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Appendix

Excerpts from the Mosman, North Sydney, Willoughby Bush Fire Management Committee Bush Fire Risk Management Plan 2017-2022

127	Former Coal Loader Complex	NORTH SYDNEY	Economic	Community Education	60	Education brochure/letter/liaise major landholders	LGA	FRNSW	[1718]	[1819]	[1920]	[2021]	[2122]
				Ignition Management	62	Restrict / close reserve from public access on days of Severe or higher fire danger	LGA	FRNSW Police	[1718]	[1819]	[1920]	[2021]	[2122]
				Hazard Reduction	61	Undertake mechanical works and / or prescribed burning	LGA	FRNSW	[1718]	[1819]	[1920]	[2021]	[2122]



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Low Risk Rating

79	3C	HMAS Waterhen	High	Unlikely	Catastrophic	Economic	Infrastructure	NORTH SYDNEY
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79	HMAS Waterhen	NORTH SYDNEY	Economic	Community Education	57	Education brochure/letter/liaise major landholders	LGA	FRNSW	[1718]	[1819]	[1920]	[2021]	[2122]
				Preparedness	40	Implement Defence Bush Fire Management Plan	Defence	LGA FRNSW	[1718]	[1819]	[1920]	[2021]	[2122]





78	3C	Milray Ave Residential	High	Unlikely	Catastrophic	Human Settlement	Residential	NORTH SYDNEY
101	4	NSW Fisheries Complex	Medium	Unlikely	Major	Economic	Infrastructure	NORTH SYDNEY
111	NA	Tryon Ave Residential	Low	Unlikely	Moderate	Human Settlement	Residential	NORTH SYDNEY
113	NA	Shirley Road Residential	Low	Unlikely	Moderate	Human Settlement	Residential	NORTH SYDNEY
114	NA	Bridge End residential	Low	Unlikely	Moderate	Human Settlement	Residential	NORTH SYDNEY