

State Significant Infrastructure Application No : SSI 14_6434
Submission re project SSI 14_6434
Stage 2 Northern Beaches Hospital
Road Connectivity and Network Enhancement Project

STAGE 2

PUBLIC TRANSPORT

The Stage 2 project does not include a major improvement to public transport along Warringah Road. Public transport would reduce reliance on cars, particularly for commuters, and reduce congestion.

An investment in public transport would have the following benefits:

- Provide an alternative to private car transport
- Address the transport needs of a broader cross section of the community
- Relieve traffic congestion along the entire E-W route (not just a 1 kilometre stretch of road)
- Provide a cost effective transport option to improve travel times
- Provide a more sustainable transport alternative
- Reduce the risk of road accidents

Improving public transport requires at least two steps:

1. Efficient connections between transport nodes
2. Localised services to link suburb areas with transport nodes.

The EIS does not provide the following information:

- An analysis of public transport deficiencies and potential improvements to services
- The transport needs of the travelling public and how these can be addressed via public transport.
- Alternative modes of transport to reduce dependence on private cars.
- The provision of a dedicated bus lane for express services along Warringah Road.

A key concern with Stage 2 proposal is that there is no provision for a dedicated bus lane along Warringah Road. Public transport needs to be considered as an integral part of the road infrastructure.

The existing road space would be more efficiently used with an overpass that would avoid the central slot and allow flexible use of the outer lanes for a dedicated bus lane during peak hours.

ACTIVE TRANSPORT

The shared path is, in some locations, too close to Warringah Road and would benefit from an increased setback to increase safety for pedestrians and cyclists. The close proximity of heavy traffic is not only unpleasant, but threatening, particularly for children and carers. Air pollution from vehicle exhausts is at high levels nearest to the road.

A wide vegetated verge would better separate pedestrians / cyclists from fast moving traffic.

The Stage 2 road widening will remove the landscape setback that currently provides a corridor for walking and cycling on the southern side of Warringah Road. The new shared path would be located between a noise barrier behind the houses and a retaining wall on the eastern side of the

road. This is an inhospitable environment for walking and cycling at night, as there is no surveillance or access to the adjoining residential lots.

LANDSCAPE CHARACTER

The retention of trees and vegetation has positive benefits for landscape amenity and air quality. The tall native trees represent the essence of the landscape character of the 'Forest'. These beautiful trees are an asset for the environment and urban amenity. Unfortunately, the proposed Stage 2 road widening does not assign any priority to the retention of these significant trees.

ALTERNATIVES

A cost / benefit analysis is required for the Stage 2 project prior to the substantial investment of public money. The EIS confirms that the 12 lane road expansion and associated with the 4 lane central slot will have many negative consequences, including irreversible impacts on the environment. Other options need to be considered to avoid the excessive road widening and excavation.

Frenchs Forest Road will be widened from 2 to 4 lanes increasing road capacity. This will ease traffic congestion on Warringah Road. If Stage 2 is delayed, money would be available for other options e.g. a bridge over Frenchs Forest Road at the intersection with Wakehurst Parkway. In the meantime, improved public transport during peak hours would further reduce congestion.

The improvement to the average speed resulting from the Stage 2 project is marginal and does not warrant the huge expenditure of public money on the excessive road widening.

ENDANGERED VEGETATION

The road widening will result in a loss of 6.1 ha of endangered Duffys Forest Ecological Community (DFEC). It is likely that this loss will be so damaging that the DFEC will become locally extinct. The Stage 2 Project is likely to have a significant impact on the DFEC.

The Stage 2 Project will also have indirect impacts on the habitat of the Red-crowned Toadlet.

Biodiversity Offsets required for DFEC and the Red-crowned Toadlet will not compensate for the in situ biodiversity values of the DFEC and Red-crowned Toadlet. However, any offsets should be located in the local area.

WILDLIFE CORRIDOR

There are no attempts to mitigate the Category 1 Wildlife Corridor along Warringah Road. The cutting with 5m high walls would be an insuperable barrier to wildlife.

Swamp wallabies inhabiting bushland in Manly Dam surrounds would be isolated from populations further north and could become locally extinct. Habitat connectivity within the corridor contributes to the survival of a viable population.

CURL CURL CREEK CATCHMENT

I have read the EIS and I am not satisfied about what has been done to address the water catchments. Even minor changes can have a significant impact on environmentally sensitive creek systems.

Curl Curl Creek is one of the few creeks on the Northern Beaches without significant weed infestation. The creek also provides habitat for aquatic species such as yabbies and a native fish

known as the *climbing galaxius*. The local population of this native fish is at the northern extremity of its habitat.

The upper catchment contains water dependent vegetation, where damp soils support dense vegetation. The bushland is in good condition containing sedges indicative of damp conditions at the headwaters of the creek. The land provides a natural buffer to protect Curl Curl Creek.

The Stage 2 road works do not provide adequate protection for this creek system.

The project should demonstrate a neutral or beneficial impact on the catchment of Curl Curl Creek, which is in Manly Dam Catchment.

IMPACTS

- Increase in impervious surfaces (10%)
- Increase in the number and size of stormwater pipes
- Increased discharge of stormwater from point sources.
- Water flow: Increase in peak flow; decrease in low flow
- Water quality: Likely increase in pollutants
- Likely increase in sedimentation and scouring
- Potential pollution incidents during construction and operation
- Potential impacts on catchment ecology e.g. soils, vegetation

Catchment protection for Curl Curl Creek is not adequate. Stage 2 should demonstrate that impacts will have a neutral or beneficial impact on water quality. A more detailed assessment is required to address the ecological impact of the project.

SURFACE WATER IMPACTS

Catchment impervious areas will increase by 10%.

Drainage lines will be subject to increases in peak flows and velocities, increasing the risk of erosion.

“Cumulative impacts on water sources include a small decrease in average flows from Curl Curl Creek (4.6%).” With an increase in peak flows, this suggests a more significant reduction in low flow conditions.

The flow changes in Curl Curl Creek are likely to have a more significant impact on Curl Curl Creek downstream from Aquatic Drive than on “the water budget for Manly Dam”.

Potential sediment deposition and scour downstream, as *“the relatively steep topography downstream of the Stage 2 Project, the installation of sediment retention basins is unlikely to be feasible”*.

Concern about the increased flows downstream of the culvert upgrades on Wakehurst Parkway near the southern limit of the works.

“The Stage 2 Project is estimated to have limited impact on downstream catchments and wetlands, with the exception of Catchment 6. Measures to address localised impacts discussed in Sections 7.2.1 and 7.3 are unlikely to cause any regional impacts to the catchment downstream of Catchment

6, requiring no further intervention.”

Sections 7.2.1 and 7.3 do not provide specific reference to Catchment 6 and there is no mention of measures to substantially reduce or avoid impacts downstream in Curl Curl Creek.

Instead, it appears that no intervention is being suggested because localised impacts are unlikely to cause any regional impacts. What does this mean? Does it infer that because the impacts will not greatly affect Manly Dam (Reservoir) that no intervention is necessary?

Curl Curl Creek is a 'Category A' Catchment (Warringah Creek Management Study 2004) with high values for aquatic ecology. The road works are a serious threat to the integrity of this creek system. More stringent measures are required to protect the creek catchment from adverse impacts associated with road widening.

GROUNDWATER IMPACTS

“Increasing the sealed surface will increase runoff and decrease groundwater recharge. This could reduce groundwater elevations resulting in potential impacts to surrounding groundwater dependent systems on a permanent basis.”

Significant drawdown of existing groundwater elevations around the slot.

“In some places it is expected that the road slot will intersect groundwater by up to 7m, near to the Red-crowned Toadlet habitat located in Curl Curl Creek catchment.”

Pollution sources: *“Primary chemicals of concern.. metals and petroleum hydrocarbons”* Also a risk from “fire retardants and other chemicals associated with managing accidents and spills” and “water derived from washing walls within the slot” if allowed to infiltrate groundwater systems.

Sensitive Receptors: Habitats of Red-crowned Toadlet, which are sensitive to changes in both surface water quality and surface water flows.

“The maximum groundwater drawdown across the Red-crowned Toadlet habitat located to the south (Curl Curl Creek GDE) of the Stage 2 Project area is estimated to be 3.0 metres in the long term.”

Groundwater seepage into the slot during operation will require management and treatment before discharge to surface water. Where will this take place and will seepage be tested for contaminants prior to discharge? Will the testing criteria ensure that there is no pollution and no adverse impact on receiving surface water?

Operation Treatment: *“There would be no Environment Protection License criteria and the primary treatment requirements would be based on background groundwater and surface water quality conditions (low flow conditions only) and subsequently ANZECC (2000) threshold criteria.”*

“Low potential risk to low to moderate quality DFEC, which would potentially use groundwater opportunistically during low rainfall or drought.” Loss of soil moisture during dry periods will significantly affect vegetation.

Re monitoring: *“monitoring should be undertaken on a quarterly basis for surface water and groundwater.”* Will monitoring on a quarterly basis be frequent enough and how will pollution events be detected if they occur in between?

QUESTIONS

1. What water quality treatment will occur with the surface and ground water that is collected and put into the water detention tanks?
2. Which government authority will be charged with the ongoing testing and monitoring of the flow and water quality that is going into the local creek system from the slot?
3. With the anticipated draw down of ground water, what effect will this have on the soil moisture and vegetation e.g. in Curl Curl Creek catchment? Will this too be monitored going forward?

QUESTIONS

1. What provision is there for a kerb-side express bus service along Warringah Road, given that the four lanes of express E - W traffic will be located in a cutting (5 metres high) in the middle of Warringah Road?
2. Will offsets to compensate for the significant loss of Duffys Forest EEC and Red-crowned Toadlet habitat be used to acquire environmentally sensitive sites under threat e.g. in the local area?
3. Why has the open space corridor not been retained for use as a shared path, with setback and buffer from Warringah Road, given that the highest pollution level is adjacent to the road?
4. Given the public money to be spent on this road project, why has there been so little public consultation during the early design phases to consider alternatives to one kilometre 12 lane road and to seek input on improved public transport options for East – West routes?