



**Office of
Environment
& Heritage**

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Our reference: DOC15/271649
Contact: Rachel Lonie 9995 6837

Brent Devine
Senior Planning Officer, Roads (Metro)
Infrastructure Projects
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Devine

I refer to your correspondence of 17 July 2015 seeking input from the Office of Environment and Heritage (OEH) at exhibition stage for the Environmental Impact Statement for the Stage 2 Northern Beaches Hospital Connectivity and Network Enhancement Works, Frenchs Forest Warringah LGA (SSD 6980).

OEH provides comments on biodiversity issues in the Environmental Impact Statement (EIS) in Attachment 1. The majority of these comments remain unchanged from those provided at the 'test of adequacy' stage as the EIS has not been amended prior to exhibition. In particular, it is noted that the Offset Strategy has not been further advanced which is disappointing, particularly as the strategy seeks to offset impacts from both the Stage 1 and Stage 2 Connectivity and Network Enhancement Works.

There are no outstanding issues for flood risk management or Aboriginal cultural heritage.

If you have any queries regarding this matter please contact Rachel Lonie, Senior Operations Officer, on 9995 6837 or by email at rachel.lonie@environment.nsw.gov.au.

Yours sincerely

S. Harrison 18/08/15

SUSAN HARRISON
Senior Team Leader, Planning
Regional Operations

ATTACHMENT 1: OEH comments on the Environmental Impact Statement, Stage 2 Northern Beaches Hospital Connectivity and Network Enhancement Works, Frenchs Forest Warringah LGA (SSD 6980).

1. Biodiversity

As identified in correspondence dated 7 August 2014, and at the planning focus meeting attended by Office of Environment and Heritage (OEH) staff on 31st July 2014, impacts on wildlife habitat connectivity and offsetting impacts on Duffys Forest Endangered Ecological Community are the main issues for OEH. These matters are discussed below.

1.1 Wildlife habitat connectivity

The Secretary's Environmental Assessment Requirements (SEARs) required the Environmental Impact Statement (EIS) to:

- describe the ecological values of the wildlife corridor, part of which occurs on the subject site and use empirical data to discuss its use by local fauna;
- assess the significance of proposed impacts on local fauna that use the corridor, and consider cumulative impacts on wildlife (including road kill data) and potential severing of major north south wildlife corridor connectivity as a result of road construction works and future road traffic;
- include details of measures that could be taken to avoid, mitigate and/or ameliorate these impacts, having regard to the range of fauna species and opportunities for connectivity (terrestrial, arboreal and aquatic) across the project. Mitigation measures may include sympathetic design and landscaping of freeway edges, installation of glider poles and ladders and underpass wildlife crossings.

Section 4.2 of the BAR states that the Stage 2 works will reduce the extent and quality of vegetation around the intersection of Warringah Road and Wakehurst Parkway resulting in an increase in distance between vegetation patches on either side of Warringah Road of up to 50 metres. The BAR discusses and maps the roadkill data collected by the Northern Beaches Roadkill Prevention Committee between 2010 and 2015 (p64 and Figure 12 p65) which reported fauna commonly killed were swamp wallabies, brushtail and ringtail possums, echidnas and long nosed bandicoots. The majority of roadkills in the Stage 2 project area were from the Wakehurst Parkway.

The BAR discusses measures to maintain fauna connectivity, although the measures proposed to create linkages and connectivity are in the east-west direction only and there are no measures to reduce the impact of this road widening in the north-south direction. Section 5.2 Wildlife Connectivity Strategy further elaborates on options for improving habitat connectivity through crossing structures; movement barriers aimed at reducing roadkill; and modifications to existing conditions such as signage and traffic speed limits.

OEH supports the measures identified in the BAR and Figure 13 to enhance fauna connectivity however there is a major omission in not addressing measures to enhance the north-south connectivity. As Figure 13 demonstrates the vegetation remaining along the hospital site (Blinking Light Reserve) and on land on the opposite side (part of which is owned by RMS) remain as habitat linkages within the broader site context. Although it is acknowledged the current Warringah Road does create a barrier for movement of fauna and already results in roadkill, OEH is concerned the increased width of roadway, combined with greater traffic volumes and higher speeds, as well as the fauna fencing will isolate the current fauna populations of ground and arboreal mammals in the southern part of the study area. The further reduction, or potential severing, of a north south connection is particularly significant as this is the only remaining link for fauna likely to be surviving in the bushland areas of Manly Dam Reserve and the southern part of Garigal National Park.

OEH would like to see further effort given to measures that could retain connectivity in the north-south direction including sympathetic design and landscaping of freeway edges, rope or other aerial bridges and ladders and underpass wildlife crossings as requested in the SEARs.

Section 4.2 of the BAR states that *“the exact design, location and number of options for connectivity measures would be considered at the detailed design phase in consultation with Warringah Council and OEH”*. As previously advised OEH notes that any additional impacts on DFEC or threatened species habitats, will also need to be offset. OEH also recommends that any conditions of consent include clear requirements for the number, general location and timing of installation of the habitat connectivity measures such as culverts and rope bridges.

1.2 Offset Strategy

The Biodiversity Assessment Report (May 2015) identifies the potential loss of around 1.2 hectares of Duffys Forest Ecological Community (DFEC) from the Stage 1 works and a loss of around 6.1 hectares of DFEC from the Stage 2 works under a ‘worst case assessment’. There is also the loss of potential threatened flora and fauna habitat including 65 hollow bearing trees and indirect impacts to Red-crowned Toadlet habitat.

The Biodiversity Offset Strategy (BOS) states that 237 biobanking credits are required to offset impacts on the DFEC and 17 for the Red-crowned Toadlet. Although the SEARs require details of offsets to be provided the BOS does not identify potential offset sites or propose a timetable for securing them.

OEH was consulted by Roads and Maritime Service (RMS) on a preliminary assessment of possible DFEC offset sites at a meeting on 25 September 2014 but has not been further consulted on potential offset sites. Given the advanced stage of this project and the decision by RMS to offset impacts arising from both Stage 1 and Stage 2 works in the one offset strategy, OEH considers the BOS does not provide enough detail to give OEH certainty that adequate DFEC offsets can be secured or that any offset will be secured as soon as possible to the impacts occurring. OEH also considers the offsets should be located geographically as close as possible to the Northern Beaches Hospital to address the community concerns about the loss of habitat in this area. OEH identified this issue at the test of adequacy stage however no amendments were made and no further contact with OEH has been made to progress the offset strategy.

The BOS discusses “potentially lengthy timeframes” associated with negotiations with landholders of land containing DFEC and a risk of delays to RMS in securing the offset. It is for this reason that OEH again reiterates the need to advance the BOS to identify the sites in consultation with OEH and Warringah Council and secure the required offsets as close to the works commencing as possible. Given the time that has already elapsed, and the fact that this offset strategy will address both Stage 1 and Stage 2 of the Connectivity and Network Enhancement Works, OEH considers it would be reasonable to require the offsets to be secured within a 12 month period from the approval of this project.

OEH has identified that offset sites should where possible be DFEC and recommends this requirement be included in any approval conditions. If the BOS cannot meet this requirement, OEH considers that there should be thorough and adequate justification for why DFEC offsets cannot be secured. There is no adequate justification in the report for the use of supplementary measures and no discussions with OEH have occurred on possible supplementary measures. Again, these matters are best considered in the BOS and it is for these reasons that OEH does not consider the BOS is well enough advanced to demonstrate how and when the offsets can be secured.

1.3 Other matters that have not been addressed in the Environmental Impact Statement

As noted previously, the SEARs required identification of appropriate *‘avoidance ... measures, including details of alternative options considered’*. There is no discussion of alternatives in the Biodiversity Assessment Report (BAR), though it is noted that such a discussion is included in the main volume of the Environmental Impact Statement (EIS). Either the BAR should be amended to include discussion of alternatives, or it should make reference to the discussion in the EIS.

Also as noted previously the assessments of significance (AoS) have been undertaken for a number of species that potentially occur in the study area. OEH understands that this has been carried out because

surveys cannot identify all threatened species that may utilise the site. However, a number of the AoS (Appendix 4) state that because the species was not found on site, then it is unlikely that the proposal will result in a loss of a viable population of that species. This is not logical. If there is potential habitat for a species on site, then an AoS should be undertaken for that species on the basis that the potential habitat will be impacted. The AoS should include an assessment of the significance of the loss of that potential habitat for the species. If it is considered that the species does not occur on site, or is unlikely to occur on site, then there is no need to undertake an AoS for that species.

(END OF SUBMISSION)