NPA

NATIONAL PARKS ASSOCIATION OF NSW

protecting nature through community action

Director of Infrastructure
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

August 20 2015

RE: Northern Beaches Hospital Road Connectivity and Network Enhancement Project - Stage 2

The National Parks Association of NSW Inc (NPA) object to the Northern Beaches Hospital Road Connectivity and Network Enhancement Project - Stage 2.

Our objection is based on the EIS which reveals the extreme impact this would have for the natural environment. In particular the loss of Duffys Forest Ecological Community, threatened species habitat and the destruction of a priority 1 wildlife corridor. Just about all of the vegetation to be eradicated (6.13 ha) is Duffys Forest Ecological Community, DFEC (6.1ha). DFEC is an endangered ecological community which is predicted to become locally extinct.

SMEC found four threatened fauna species and no threatened flora species during their field surveys: Red- crowned Toadlet (Pseudophryne australis), Powerful Owl (Ninox stenua), Swift Parrot (Lathamus discolor) and Grey-headed Flying fox (Pteropus poliocephalus).
Further the area provides with medium to high likelihood habitat for 40 threatened or endangered fauna species and 17 listed flora species. The fact that these were not present during the field survey is not strong evidence that they do not exist in the proposed area. Seasonal changes and dormancy can hide species easily over the timespan that was used for conducting the studies.

Ecological connectivity is planed to be decimated, by destruction of two existing wildlife corridors. A large regional corridor, that links northern bushland from Garigal national Park, Oxford Falls and Narrabeen Lagoon Catchment with Manly Dam bushland and a small one that follows Warringah Rd along its southern side and connects bushland between east and west. The large regional corridor is limited by Warringah - and Frenches Forest road. We are pleased to read that SMEC's studies confirmed that even bandicoots manage to cross the Warringah road barrier. From roadkill data, we know about the continuous use of the priority 1 or 'regional' wildlife corridor. It is used by large terrestrial animals including wallabies, bandicoots, possums. It could be used by others for example echidnas and tiger quolls.

The Spotted Tailed Quoll (Dasyurus maculatus) which has recently been confirmed to be in the Narrabeen Lagoon Catchment will be unable to cross over to Manly Dam bushland and we disagree with the conclusion that this would have no adverse impact on the life cycle of this species (7 part test)

Connectivity considerations are in SMECs assessment reserved for threatened fauna species, connectivity must be preserved for all species as to prevent species becoming locally endangered and extinct. The swamp wallabies within the Manly Dam area rely on this corridor.

A lesser corridor follows along the bushland south of Warringah road and is used by birds and small animals predominantly.

We note that water run off patterns and habitat in rock formations are impacted. Acidity changes and nutrient loads are predicted from the increase in road surfaces. This will facilitate weed invasion and habitat decline and light will further deter movement in the corridor. Also noise levels will further degrade habitats for fauna.

The climbing Galaxias, a fish in the Manly Dam area that colonises Curl Curl creek will be placed at risk of extinction as water flows will be altered.
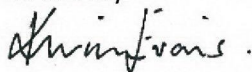
Several species populations within the Manly Dam Area are likely to become extinct if the priority 1 wildlife corridor is cut.

It is predicted that edge effects will continue after construction and further degradation of the remaining bush is to be expected.

Offsets are not determined and the potential to acquire these from areas not adjacent to the local bushland must at a minimum be ruled out.

In conclusion, the Stage 2 proposal is unacceptable because of its environmental consequences.

Sincerely

Kevin Evans
CEO National Parks Association of NSW Inc.