

Friends of Narrabeen Lagoon Catchment



P.O. Box 845, Narrabeen NSW 2101

28th November 2013

Development Assessment Systems and Approvals
Department of Planning
GPO Box 39
SYDNEY NSW 2001
Attention: Director, Industry, Social Projects and Key Sites

Re: Proposed Northern Beaches Hospital at Frenchs Forest, SSI 5982

OUTLINE of CONCERNS

The Northern Beaches Hospital Site is located on a ridge that separates sensitive catchment areas, including Narrabeen Lagoon Catchment. The proposal would have a major impact on the ridge area and require the removal of a significant remnant of high conservation bushland. This important bushland remnant is also a Wildlife Corridor.

We are concerned about the environmental impacts of the proposal. These include:

The loss of Endangered *Duffys Forest* Ecological Community.

A loss of Priority 1 Wildlife Corridor between Narrabeen Lagoon Catchment (north) and Manly Dam Catchment (south).

The removal of under-storey vegetation from remnant bushland for asset protection.

The visual impact of the 6-10 storey building. The tall buildings located on a ridge top would be visible from surrounding areas including Narrabeen Lagoon Catchment. The EIS does not contain any information on the likely impact on scenic amenity.

Environmental impacts associated with increased traffic, including the potential for increased roadkill.

Increased hard surface areas and the potential impact on waterways.

Cumulative impacts on the environment. This includes the threat to other bushland areas in the Catchment.

The proposed bio-banking off-set is inadequate to compensate for the loss of over 4 ha of EEC. The 10 ha of bushland on the Belrose WMS site is not under threat and is already protected. Its management under NPWS is supported, but it is not an adequate compensation for the loss of the EEC on the hospital site.

Any proposal to widen Wakehurst Parkway would result in the extensive loss of bushland and wildlife habitat.

Narrabeen Lagoon Catchment has positive values and benefits that relate to health, recreation, sustainability and the global city of Sydney.

The protection of natural areas, including wildlife corridors and biodiversity within the Catchment, warrants a high priority.

Following are excerpts from the Stage 1 EIS application, interspersed with notes.

ENVIRONMENTAL RISK ANALYSIS

The DGRs require the EIS to include an environmental risk analysis to identify potential environmental impacts associated with the proposal. (s4)

Likelihood:	Consequence:
A Almost certain	1 Widespread irreversible impact
B Likely	2 Extensive but reversible (within 2 years) or irreversible local impact
C Possible	3 Local, reversible (within 2 years) impact
D Unlikely	4 Local, reversible, short term (<3 months) impact
E Rare	5 Local, reversible, short term (<1 month) impact

Visual appearance of hospital buildings	A 2 High
Loss of bushland setting and screening vegetation on hospital site	A 3 Medium

Flora and fauna

Removal of Duffys Forest Ecological Community	A 1 High
Removal of habitat for listed threatened species	A 2 High
Removal of fauna habitat	A 2 High

VIEW IMPACTS

The hospital site is located on a high point in the local landscape and the hospital would represent a significant new built feature in the landscape. At up to 10 storeys in height, it would be the tallest building in the area, and the upper levels would be visible from multiple viewpoints in the surrounding area. (s7.3)

Note: The prominence of a 10 storey building located on the ridge has the potential to affect scenic amenity when viewed from vantage points within Narrabeen Lagoon Catchment.

BIOBANKING OFFSETS

“3.1 Tier 1 pathway

The Tier I pathway sets out an ‘Improve or Maintain’ standard where

red flag assets are protected and clearing only occurs within the variation rules set out in the BBAM, and the offsetting requirement calculated by the credit calculator is met.

The proposal does not meet the Tier 1 standard because red flag assets are to be cleared outside the rules allowed by the BBAM.

Clearing outside the rules allowed by the BBAM is necessary because:

- The entire site would potentially be utilised by the Northern Beaches Hospital development so options to avoid impacts on red flag areas on the site, such as considering different configurations of the development footprint, are not considered practicable
- The viability of biodiversity values on the red flag areas on the site would not be considered low or not viable.”

(Biodiversity Offset Strategy s3.1)

“It is noted that under variation criterion d), where ecosystem credits are converted to hectares,

35 ha at a suitable offset site would be required (see James 2013). It is proposed to adopt the minimum offsetting ratio of 2:1 as described above because:

- Other suitable offset sites in the same bioregion are not known to be readily available on the market
- The high value of land in the Northern Beaches region would result in unreasonable cost in securing any offset site (assuming it was available) of sufficient ecological scale and location to meet the additional 25 ha required in variation criterion d)
- The average cost per credit to HI to retire all credits in Agreement 55 is in the higher market average range at \$6,098 per credit. In total HI would spend over \$700,000 to offset the ecological impacts from the hospital development through Agreement 55 with WAMC.

HI would be purchasing and retiring 17 Red-crowned Toadlet and 29 Rosenberg’s Goanna species credits as part of the WAMC negotiations in Agreement 55. It is noted that these species have a greater conservation priority than the Powerful Owl in the Pittwater region. It is proposed that 46 of the 121 Powerful Owl species credits be retired as per variation criterion b) in Attachment B to the offset policy. Regarding the remaining 75 species credits required for the Powerful Owl, it is proposed that these be waived in accordance with variation criterion e) in Attachment B to the offset policy.”

(Biodiversity Offset Strategy s3.1)

□ WAMC has made arrangements with NPWS that the land area covered under Agreement 55 would be absorbed into adjoining Garigal National Park, effectively increasing its area and securing formal management as an ecological reserve in accordance with the management plan prescribed in Agreement 55 (Appendix B).
(Biodiversity Offset Strategy s4)

Note: The \$700,000 is considered to be too high to offset the ecological impacts of the hospital, Yet this is less than the value of the average residential lot, a mere 0.001% of the \$600m cost of the hospital, and a small fraction of the combined cost of the hospital and infrastructure. The environmental significance of the site has been grossly undervalued.

4.7 Cumulative impacts

There will be a cumulative impact of clearing on DFEC, with an estimated 4.48 ha of Duffys Forest to be cleared as a result of the proposed project. Duffys Forest Ecological Community occurs primarily in Warringah and Ku-ring-gai Local Government Areas. It is estimated that only 15% of the original distribution of Duffys Forest Ecological Community remains, all in remnants.
(Biodiversity Specialist Report s4.7)

Note: The proposal would result in the loss of an important remnant of *Duffys Forest* EEC.

WILDLIFE CORRIDOR

The project is located in an area where several major roads intersect. Existing remnant vegetation adjacent to the study area is not currently sufficient to provide enough suitable habitat and coverage to act as wildlife corridors. The improvement of existing corridors and creation of additional corridors are necessary to facilitate wildlife movement out of the study area and across the landscape.
(Biodiversity Specialist Report s7.2)

Note: The proposal would result in the substantial loss of a significant wildlife corridor between catchment areas.

RESERVE LAND

As noted in Section 5.2, the concept proposal provides for the retention of an area of vegetation at the eastern end of the site, but with the understorey largely removed. This area would be managed as part of the overall site landscape management, and is anticipated to have limited habitat value with regard to flora and fauna.
(s7.5)

Note: The Blinking Light Reserve on the eastern end of the site is “a small remainder of an original stand of DFEC situated on deeper shale soils of the ridgetop plateau” and its primary values are “the high conservation value of its vegetation, its important linking role in a major wildlife corridor and the scenic amenity it provides on a major arterial road”.

BUSHFIRE

The EEC located to the east of the site should be managed to the standard of an asset protection zone understorey...Currently, it is planned to retain the area of vegetation at the eastern end of the site but substantially reduce the protection zone understorey. This would materially contribute to reducing bush fire risk for the site.

(s7.6)

Note: The removal of understorey vegetation would reduce the ecological value of the EEC.

STORMWATER

Stormwater Management Strategy and Plan

According to the Warringah Council “Northern Beaches Stormwater Management Plan”, July 1999, the north of the site sheds to the north east and contributes to the Narrabeen Lagoon Catchment. The remainder of the site sheds to the south east and to Manly Lagoon Catchment. (s2)

The majority of the existing site is bush landscaping, with a relatively small impermeable proportion, in the form of Bantry Bay Road and residential properties. (s2)

Stormwater runoff from the site currently sheet flows to the surrounding road network where the water is captured by a pit and pipe network. These networks are Council and RMS owned assets. (s2)

Opportunities should be explored during the detailed design to optimise the storage requirements. This may include the incorporation of high early discharge, infiltration, rainwater reuse and variable/ staged outlets. (s3.2.1)

Early concept designs for the site indicated that a large proportion of the site would be occupied by basements. Therefore scope for providing below ground OSD storage would be limited. (s3.2.2)

Bioretention systems, tree pits and rain gardens

It is unlikely that bioretention and rain gardens would be the most suitable devices for the site considering the large footprint areas required for treatment. They are also ideally suited to the treatment of phosphorus and nitrogen which have been identified through consultation with Council to be of less significance for treatment. However, due to their aesthetic appeal and ability to be integrated into landscaping, they may be a suitable method of treatment in conjunction with alternate techniques. (s3.6.2)

(Minutes: 10 Dec 2012)

2. Stormwater and OSD

“As discussed at the previous meeting, Arup advised that the

opportunity for providing OSD on the site is limited without impacting the retained Duffy's Forest area which is considered undesirable. All agreed that with basement extents required for parking there is limited scope for providing detention within site."

3. Water Quality

"Council referred Arup to the Northern Beaches Stormwater Management Plan for determining water quality requirements. Council confirmed that phosphorous and nitrogen pollutants reduction targets are not relevant due to the anticipated low generation rates for the development. However total suspended solids, gross pollutants and hydrocarbons etc must be reduced in accordance with the Northern Beaches Stormwater Management Plan. Arup are to review the water quality requirements for the project.

Council was not keen on the option of providing off-site OSD due to the impact on natural vegetation etc. Council referred Arup to Natural Environment Manager, Adam Burrows for further discussion on this item."

Note: There would be limited scope for providing on site detention and water quality impacts / requirements have not been determined. Storm-water pollutants from hard surface areas would affect downstream areas in the catchment.

TRAFFIC INCREASE

As can be seen from Table 11, intersection performance is generally poor, reflecting the significant volumes of traffic during both AM and PM peak periods. The intersections of Warringah Road with Wakehurst Parkway, and Warringah Road with Forest Way are both operating at the maximum limits of their designed capacity and cannot be expanded any further as at-grade intersections (AECOM 2011b).

(s7.4)

In the hospital opening year of 2018, there could be up to 900 outbound trips generated by the hospital in the PM peak. (s7.4)

Note: The additional increase in traffic would be significant and would affect the surrounding areas. The EIS does not mention air pollution associated with traffic.

STATE SIGNIFICANT SITE BOUNDARY

Note: The SSI boundary that was adopted in October 2012 includes the hospital site and bushland areas that form part of a wildlife corridor. We are concerned that development associated with the hospital will result in further impacts on this corridor.

CUMULATIVE IMPACTS

With regard to the hospital, the greatest potential for cumulative impacts is considered to relate to the supporting road works. These would likely need to occur prior to hospital opening in 2018 and would therefore generally happen at the same as construction of the hospital. (s7.14)

Minimal to no cumulative impacts are anticipated with regard to the site clearance and preparatory works. At the time of preparation of the EIS, it was anticipated that the supporting road works would occur well after completion of these works (i.e. 2015 or later but prior to hospital opening). (s8.7.4)

Note: The cumulative impacts on the environment, including nearby bushland areas and catchments, is not mentioned in the EIS. The likely extent and potential cumulative impacts of the supporting road works is not specified.

CONSULTATION

As part of DP&I's community engagement process for the Northern Beaches Hospital Precinct, two Community Visioning Workshops were conducted in December 2012. (s 6.5)

A number of health practitioners also attended the forums as did representatives from local community and special interest groups, including:
...Friends of Narrabeen Lagoon Catchment Committee...(s 6.5)

Note: Representatives from our Committee who attended the Workshops reported that attendees raised a range of issues, including concerns about the environmental impacts.

The location of the new hospital took into account factors including future population distribution, travel time, availability of sites and the catchment required to ensure a critical mass of patient demand. Consultation occurred with the community and local councils which resulted in Frenchs Forest being selected as the preferred location. (s 6.5)

Note: The environment is not included in the list of factors taken into account in the location of the new hospital. The wider community were not involved in this consultation phase.

Table 6

Visioning Workshops: key issues and planning responses

Area amenity and environmental preservation

A Masterplanning Constraints Document has been prepared for the site to ensure appropriate consideration of issues around access, setbacks, building form and height, massing and creation and maintenance of green space is retained on-site. There is also an acknowledgement that the site should interface with the community with various activation areas to be considered as part of the hospital design process.
(s 6.5)

Note: The response in Table 6 does not address the environmental concerns that were raised at the workshop.

SITE CLEARING

Note: No clearing of bushland on the site should take place until such time as final plans and infrastructure associated with the hospital have been approved. Until this time, the bushland provides an important amenity and function as a wildlife corridor. The premature clearing in advance of construction works is not supported.

P & J SMITH REVIEW

(Ref: Review of Biodiversity Aspects, Peter Smith and Judy Smith, November 2013)

Note: The Review concludes that the environmental impact would be 'severe', the offset is far from adequate, and there is no offset proposed for wildlife corridor.

□ “The impact of the proposal would be severe, involving clearing variously reported in the Environmental Impact Statement as 4.95 ha or 5.11 ha of the Duffys Forest Ecological Community, and 4 ha or 4.2 ha of Powerful Owl habitat. The clearing would also reduce the efficacy of the wildlife corridor.”

□ “The proposed offset is grossly inadequate. The offset site contains no Duffys Forest Ecological Community (contrary to claims in the Environmental Impact Statement), nor any other endangered ecological community; it contains no Powerful Owl habitat (although it does contain habitat for two other threatened species); and it falls well short of the offsetting requirements calculated using the BioBanking Assessment Methodology credit calculator, which is the standard method in NSW for objectively assessing biodiversity impacts and offsetting requirements. No offset is proposed for the impact of the proposed hospital on the important wildlife corridor value of the site.”

Yours sincerely,

A handwritten signature in black ink that reads "Tony Carr". The signature is written in a cursive, slightly slanted style.

Tony Carr
President