



Hunter Environment Lobby Inc.

PO Box 188
EAST MAITLAND NSW 2323

7 April 2011

Major Project Assessments
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

Submission - Nundah Bank Third Track Project (MP 10_0094)

The Hunter Environment Lobby wishes to make a submission commenting on the proposed Nundah Bank Third Track near Singleton. In particular, the group wishes to comment on the biodiversity impacts of the proposed additional railway track.

The Hunter Environment Lobby is a regionally based environment group and supports improvements to public transport and the protection of biodiversity and natural habitats.

The following concerns must be considered in determining the proposal:

- 1 Inadequate information has been provided on the proposed ameliorative measures to be taken for biodiversity impacts on the four listed threatened species directly impacted, plus other native species.
- 2 A review of threatened species impacts cannot be adequately be undertaken without knowing the species populations in the affected area and the locality. The assessment fails to do this, especially for key species such as the Squirrel glider and Grey Crowned Babbler. Further assessment is required to fulfil the Director-General's requirements in this regard.
- 3 A draft of the fauna and flora management sub plan referred to in the assessment should have been included as part of the proposal, together with full details of the proposed biodiversity offsets that are foreshadowed.
- 4 Engineering measures/structures should be included as part of the design of the project to allow threatened species and other native fauna to be able to effectively cross the railway line at a minimum of 1 km intervals along the new section of track. This may include above ground fauna bridges or suitably designed culverts. This must be complemented by suitable habitat restoration.
- 5 Biodiversity offset areas to be acquired and protected must be sufficient to provide for a minimum of 10:1 offset ratio, with the land identified before the project is approved. It is inadequate to say in the environmental assessment report that a biodiversity offset plan "will be developed".
- 6 As evidenced by the aerial photographs, the soils and landscapes in the vicinity of the project are highly erodible. Particular attention must be paid to the rehabilitation of batters, gullies and disturbed areas, and any approval must provide for stabilisation and rehabilitation of these areas to be monitored and restored for at least a period of 5 years following the completion of construction.

The group asks that the above matters are resolved prior to project approval.

yours sincerely

Jan Davis (President)