

Biodiversity Objections

I am writing to formally object to the Northern Beaches Tunnel plans and intent. My reasons for objecting are outlined below.

I object for the future of this city (why build road tunnels when we should be building public transport infrastructure? Why remove much needed and rapidly diminishing green space), however most importantly I object for the future of our children. What legacy are we leaving them?

I object to:

- Urban bushland is fast disappearing under Sydney's bulldozers. For the future of the urban environment, we can no longer afford to put construction sites, with all their impacts, in biodiversity rich areas.
- The proposed project counteracts the principles of Ecologically Sustainable Development in the Protection of the Environment Administration Act 1991 (NSW) which declares that the conservation of biological diversity and ecological integrity should be of fundamental consideration (PEAA Act Part 3(2)(c)).
- Bushland set aside for environmental protection should not be destroyed or disturbed. Flat Rock Reserve is a declared Wildlife Protection Area as it provides significant habitats that support a wide range of small birds, mammals, reptiles and frogs that are disappearing from our urban areas.
- Flat Rock Gully is a key part of the network of wildlife corridors across Sydney required to maintain biodiversity.
- Around 6.77 hectares (over 16 acres) of bushland will be flattened for the construction footprint (EIS Chapt. 19, p.19.9) at Flat Rock Gully. Around 54 acres of bushland, which provides important habitat for wildlife in the Willoughby and Manly local government areas, will be destroyed at the combined sites.
- Over 390 trees are targeted for potential destruction at Flat Rock Gully – only two-thirds will be replaced. Willoughby City Council (WCC) tree policy requires that 3 trees be replaced for each removal (WCC, Vegetation Management Strategy 2020). Local tree policies are required by the NSW Government to reflect the needs of different areas for tree canopy and wildlife habitat. These should not be overridden by the NSW State Government.
- The bushland at Flat Rock Gully has been targeted for destruction on the basis that it is 'only' regenerated bush. This regeneration is the result of 25 years of work by WCC and bush care volunteers. Most of the plantings were propagated from local indigenous plants. Wildlife doesn't discriminate between regenerated and remnant indigenous trees and bushland.
- Biodiversity at Manly Dam and adjacent bushland will also be negatively impacted:
<https://viabletransportsolutions.com.au> and
<https://www.facebook.com/SaveManlyDamBushland/>

- Biodiversity is poorly scoped in the EIS. The bulk of the biodiversity assessment concentrates and comments on 23 threatened species only. It side-steps the many hundreds of species which will lose their habitat, be driven away or bulldozed under including a wide range of bird species, frogs, reptiles, mammals and aquatic animals. See fauna list attached.
- A full study of wildlife has not been, and will not be, carried out in Flat Rock Gully, Middle Harbour and nearby bushland. Desktop assessments and a few walk-throughs are inadequate to reveal its full biodiversity.
- The use of the controversial biodiversity offsetting policy allows for the clearing of bushland in urban communities. This policy, which allows for destruction of biodiversity in one area as long as it is protected somewhere else in NSW, is a recipe for local extinction.
- The EIS acknowledges that animals and birds on the construction footprint and nearby bush reserves will be driven away, in some cases permanently, by loss of habitat, food and breeding sites and by the noise, lights, vibration and traffic yet there are few well-developed mitigation plans for the variety of species which will be impacted. (EIS p.19-64).
- The proposed mitigation measures to protect wildlife during construction are weak. Checking that no animals are in the way 24 hours before construction or having people 'spot' them from barges and remove them during construction seems doomed to failure as it will not be the main focus or within the expertise of most constructors.
- The health of local creeks, waterways and the marine environments are at risk from scouring, elevated salinity, siltation, contamination by disturbed toxic materials from the tip site and accidental fuel or chemical spills. Groundwater drawdown of more than 20 metres will contribute to trees becoming stressed or dying in other parts of Flat Rock Gully away from the construction footprint, especially in times of drought.
- Excavation of Middle Harbour sediment has the potential to release heavy metals, pesticides and tributyltin, a chemical used in cleaning boats, which has been banned since 2008 as it causes sex changes in marine organisms.
- The EIS is inconclusive on the future of the destroyed site which is 5% of the Flat Rock Gully Reserve. Decision-making about its future should not be left to the end of the construction process. The EIS should confirm its rehabilitation and return it to bushland.

2. Changes/Conditions I ask for

- Consider ecologically sustainable alternatives to the car tunnel. Fully scope alternative public transport options.
- Carry out full assessment of biodiversity in and around area to be destroyed in Flat Rock Gully. Check trees for hollows across the gully area. Carry out fish and macroinvertebrate sampling in creeks and waterways.
- In consultation with wildlife experts, develop a full suite of mitigation measures to protect the wildlife in local bushland from noise, light and traffic in Flat Rock Gully.

- Undertake full bush regeneration and provide three for one tree plantings as required by the local vegetation strategy.
Biodiversity credits are likely to be applied to areas too far from the construction footprint. We need additional work done before construction to provide nest boxes and rock habitats for displaced wildlife. Biodiversity credits should also be applied long term to weeding and bush regeneration in Flat Rock Gully Reserve.
- Ensure all landfill exposed by tunnelling is capped at the end of tunnelling and reinstate crushed sandstone as a contoured base for re-establishment of locally indigenous vegetation and habitat. Remove all temporary structures (including noise mitigation sheds).
- Engage consultants (independent of contractors) to measure water quality in the creek before, during and after construction to check for scouring, contamination from the site and elevated salinity and sediment levels. Make this information publicly available.
- Include clear strategies in the EIS to counteract the release of contaminants into Middle Harbour following storms or due to silt curtain damage during construction.
- If the proposal is approved, it is vital that, at the end of the project, the construction site in Flat Rock Gully is restored to bushland consistent with the Environmental Conservation zoning of the site and in accordance with the local Urban Bushland Plan of Management and the Flat Rock Gully Reserve Action Plan.

I implore you to not go ahead with building of this tunnel.

Kind regards
Willoughby resident