Submission to the North East Link Community Liaison Group Report

Warringal Conservation Society is a local, not for profit, community-based organisation caring for the Environment. We have been protecting, restoring and rehabilitating the natural environment for native flora and fauna in Banyule for 49 years, in particular Banyule Flats and Warringal Parklands. The comments in this submission are related to the impact of the North East Link on the natural environment.

As overarching principles we would like to see:

1. Extension of the tunnel north to Grimshaw Street or the M3
2. No net-loss of trees within Banyule
3. No net-loss of green open space within the Banyule
4. The adoption of international best-practice standards for construction and monitoring (eg minimum levels for noise and air emissions including particulates), thus affording better protection than current Australian standards and Victorian policies
5. Strict controls on the footprint of the construction zone to minimise environmental damage, especially around sensitive areas, and including the Early Works Plan. During construction there is a risk that the project footprints could be stretched without clear controls to minimise areas used for ramps, roadside areas, spoil and equipment laydown
6. Transparent reporting of monitoring for light, noise, air and water quality to establish background levels prior to any works. Extensive regular monitoring during and after construction. Monitoring data and site operations to be audited and reported to the public quarterly
7. Confirmation that Banyule Flats and Warringal Parklands will not be used as a staging or water treatment areas. Any required surface works should not be done until a risk assessment has been reviewed and assessed by an independent environmental auditor
8. Enhancement of the vegetation especially trees, within the corridor instead of 'no net loss'
9. Complimentary alternate transport projects should not widen the footprint of the NEL
10. Retention of Banyule and Koonung Creeks as natural open and unlined waterways

Transport – including traffic, public transport, cycling and walking

We are concerned for:

- Construction of multi-use pathways within Banyule Flats Reserve. This is a sensitive area, rated as being of State Ecological and Conservation significance and should be respected for wildlife habitat, passive recreation and indigenous values
- Cycling and walking paths in the vicinity of Bulleen Road, which need to be sited well clear of the sensitive Bolin Billabong
Disturbance of vegetation and banks at river and creek crossings

There is an opportunity for:
- An additional foot/cycle path along the eastern bank of the Yarra between Banksia Bridge, Heidelberg and Finn’s Reserve, Templestowe, linked to the Main Yarra Trail by a new foot/cycle bridge across the Yarra River near the Plenty River confluence with the Yarra. This will greatly enhance active transport, linking Banyule Flats (west) to Birrarung Park (east) and facilitating access to the Main Yarra Trail and Plenty River Trail from the eastern (Manningham) side of the river.

Project construction and subsequent amenity and safety

We are concerned for:
- The ‘conditional’ no-go status of Banyule Flats Reserve and whether this area may be used for staging during construction or for treatment of water run-off.
- The uncertainty of flood management (from both the Yarra River and from local storms) in the Yarra floodplain and at the 3 interchanges is of concern, with potential collateral environmental impact.
- Temporary use of areas for construction, lay down and staging may compact and remove topsoil, remove current trees and ground cover. Any such damage needs to be fully rehabilitated.

There is an opportunity for:
- Strong guidelines in the construction agreement regarding protection of Banyule Flats and Bolin Bolin Billabong
- Transparent reporting of monitoring and accountability with involvement of an independent authority. How will the contractors be monitored and held accountable during the life of the project?

Environment and heritage, especially noise and air quality impacts

Impact on wildlife and habitat

We are concerned for the impact on wildlife:
- Habitat loss at ground level and loss of mature trees which currently provide nesting, feeding and roosting sites
- Noise disrupting faunal communication and mating
- Light spill into adjacent parklands, disrupting nocturnal animal feeding and movement along wildlife corridors
- Loss of ground water, especially where creeks are replaced by barrel drains
- The risk of vehicle and wildlife collision on roadways.
- Protection and management of fauna during construction works and project operation
- The proximity of the Eastern Freeway widening works to the Grey-headed Flying Fox Camp.

We are concerned for the many habitat trees which will be removed throughout the corridor:
- Potential loss of the old River Redgum scar tree at the corner of Bridge Road and Manningham Roads, which has indigenous significance.
- Loss of indigenous bushland at the Simpson Army Barracks which includes two listed species: Matted Flax-lily (Dianella amoena) and Studley Park Gum (Eucalyptus x studleyensis).
- Increase in the local heat effect and negation of local efforts to stem climate change due to the reduction in the number of trees in the area.
- Alteration of the hydrology (eg ground water) and resultant loss of vegetation adjacent to the NEL due to excavation, tunnelling, water draw down and the increase in hard surfaces

There are opportunities for:
- Barriers, alternate crossings (eg culverts) and sensitive lighting (eg dimmer light bridges to enable safe flight paths) to minimise impact on fauna. Specific measures will be required to reduce noise, light and water quality impacts on the Grey-headed Flying Fox camp.
- Intensive indigenous planting to widen and add density to the riparian zone on both sides of Yarra River from the Plenty river confluence to the Eastern Freeway then to Dights Falls. Plants should include the Studley Park Gum (*Eucalyptus x studleyensis*).
- Re-vegetation plantings need to be supported with ongoing maintenance funding.
- Translocation of a proportion of the Matted Flax-lily plants from the Simpson Army Barracks to elsewhere in Corridor A, e.g. around the Banyule Billabong if suitable habitat, so that this threatened species is not lost from the Banyule area.
- Extending the tunnel north to Grimshaw Street to prevent loss of vegetation at the Simpson Army Barracks

**Impacts on wetlands and waterways: Banyule Creek, Yarra River, Banyule Flats wetlands, Bolin Bolin Billabong and surrounding wetlands.**

We are concerned for:
- Changed hydrology which could impact on vegetation, creek flows and water in wetlands. The conversion of Banyule Creek and Koonung Creek to covered and/or concreted drains, will alter the microclimate of those watercourses and reduce surface water for wildlife.
- Whether Banyule Creek from Borlase Reserve to Banyule Flats will be altered or converted to a drain
- Run-off of water contaminated with vehicle oils, chemicals and tyre and brake particles due to the substantial increase in hard surfaces
- How water run-off treatment will be managed, where treatment sites will be located, whether they will be designed to blend with the natural environment, and where the treated water will enter creeks, rivers and storm water drains.
- Whether the quality of water entering waterways will match Melbourne Water’s criteria for 10-50 year targets
- Whether spill containment measures will be included in EPRs as per AusRoads guidelines

There are opportunities for:
- An overarching engineering solution to achieve regular watering of Banyule Billabong, and realignment of Banyule Creek at Banyule Swamp in order to achieve a more natural water flow through Banyule Wetlands
- Whether there will be a clear and long term commitment for ongoing monitoring of groundwater levels and resolution of identified variations

**Adjacent land, community spaces and connections**

We are concerned for:
- Loss of community amenity due to visual impact of the roadways, namely noise barriers, flood walls and lighting especially within sightlines from adjacent homes and parklands.
There are opportunities for:

- Replacing lost green space within Banyule e.g. by expansion of existing parkland around the Manningham interchange after construction and purchasing private land adjacent to creeks and rivers.
- Replacement and screening planting should be with indigenous species, enhancing current vegetation levels.
- A dedicated ongoing budget of x% of tolls could be established to maintain plantings. There needs to be specific provision for who is financially responsible for maintaining the landscaping and urban design elements of the project.
- Use of international best practice standards to control and monitor potential environmental effects rather than current minimum Victorian/Australian standards.
- Sensitive design and vegetative screening is for barriers and embankments.

Planning and design, footprint, social and business impact

We are concerned for:

- The proximity of the NEL footprint to culturally significant Bolin Bolin Billabong, a designated no-go zone, and potential impacts on its hydrology, amenity, ecology and wildlife. The footprint around Bolin Bolin for protection is not specified and maximum possible distance between the project and billabong is needed.

There are opportunities for:

- The land used for staging and temporary tunnel entrance south of Manningham Road to be acquired for the Wurrundjeri Land Council with potential for the construction of an indigenous interpretive centre associated with the planned Yarra Cultural Precinct.

Communication, process and consultation

There are opportunities for:

- Community Liaison Groups and other avenues of community consultation should continue throughout the planning and construction phases including design (e.g. of barriers) and landscaping.
- A community representative as member on the selection panel of the construction company.
- An independent committee, to include representatives of community, local government and environmental monitoring experts to receive and review regular reports of air, water quality, hydrology, noise and complaints from the public. Issues should be referred to the relevant authority requesting appropriate action. All reporting should be transparent and available to the community.

Daphne Hards

President
2 April 2019