

Submission Cover Sheet

North East Link Project EES IAC

563

Request to be heard?: yes

Full Name: Daphne Hards
Organisation: Warringal Conservation Society
Affected property:
Attachment 1: WCS_Submission_
Attachment 2:
Attachment 3:
Comments: Attached



Warringal Conservation Society

SUBMISSION TO THE INQUIRY AND ADVISORY COMMITTEE ENVIRONMENT EFFECTS STATEMENT FOR THE NORTH EAST LINK PROJECT

Introduction

Warringal Conservation Society (WCS) opposes current plans for the North East Link (NEL) through Banyule due to the environmental cost at both a local and global level.

- We also contend that large freeways/tollways will not solve Melbourne's medium and long term transport needs, and will divert funds from other much needed public transport and rail freight initiatives.
- If the NEL is to be constructed, we believe that extensive changes should be made to the plan detailed in the reference design, to reduce the environmental impacts of construction and operation.
- There was insufficient consideration of a wider range of alternatives: public transport; other routes; tunnel extension; use of tunnel boring machine or mined tunnel instead of cut and cover tunnel; freeway instead of tollway.
- Australia has a poor record of species extinction and yet the Environmental Effects Statement (EES) is dismissive of the significant impact on Matted Flax-lily and Studley Park Gum.
- The Yarra River Protection (Willip-gin Birrarung Murrong) Act 2017 protects the Yarra and its tributaries from private developments but it is inconsistent that public infrastructure development is exempt.
- The construction and operation of the NEL will contribute to climate change.
- The project significantly impacts on the amenity of local population by restricting visual and physical access to green spaces.
- The freeway/tollway will reduce tree canopy and significantly reduce habitat in the corridor for many decades.
- The project offers insufficient compensation and limited benefits to the local community.
- The impact on ground water and surface water, and resultant changes to habitat, are uncertain.
- There is a net loss of green open space within the north-south corridor.

Should the NEL be approved for construction we seek the following broad conditions:

1. Redesign of the section north of Lower Plenty Road to protect the Studley Park Gum and Matted Flax-lily habitat at Simpson Barracks
2. Identification of Simpson Barracks as a 'no-go' zone
3. Additional tree planting within the corridor rather than the virtual 'no net loss' proposal of 30,000 replacement for 26,000 lost and offsets outside the area. Re-vegetation of sub-story and ground cover species be undertaken. These plants should be additional to the 30,000 trees
4. Retention of Banyule Creek and Koonung Creek as open, unlined waterways
5. Protection of Banyule Flats habitat from changes to stormwater flow regime and water drawdown
6. Protection and enhancement of the quality of water entering the Banyule Creek, Koonung Creek and the Yarra River
7. The adoption of international best-practice standards for construction and monitoring e.g. minimum levels for noise and air emissions including particulates
8. Identification of the River Red Gum, the National Trust's 2019 Victorian Tree of the Year, at the corner of Bridge Street and Manningham Road as a 'no-go' zone
9. Additional open public green space to compensate for the overall loss of conservation, passive and active space within the north-south corridor of the NEL
10. Identification of the habitat trees used by Swift Parrots at Macleod Railway Station as a 'no-go' zone

Warringal Conservation Society (WCS)

Warringal Conservation Society, formed in 1970, is a not for profit, community-based organisation caring for the Environment. Our main focus is in Banyule's local parks adjacent to the Yarra River, being Banyule Flats Reserve and Warringal Parklands (this project's conditional no-go zone), where we have worked beside Banyule City Council to enhance the habitat particularly for wildlife, restore indigenous vegetation, control weeds and create a beautiful space for all to enjoy.

We aim to:

- Restore and enhance indigenous vegetation to provide habitat and carbon control
- Share information about conservation and natural history
- Promote sustainable living and use of resources
- Encourage our local community to be active in conservation
- Interact with governments at all levels to keep them accountable for environmental decision making

Our Environmental Concerns about the Project

The NEL will result in loss of habitat, impacting on the viability of several federal, migratory and state listed species, and reducing local biodiversity. WCS is concerned about the cursory description of the loss of large trees and habitat, and uncertainty due to potential groundwater drawdown and surface water management.

As a conservation group located in Banyule our comments on the EES are focussed on the North-South section of the NEL i.e. between the M80 and the Eastern Freeway at Bulleen. Although we acknowledge the potential health and social impacts of this project our submission focuses on the natural environment.

Our concerns include:

- Loss of vegetation to enable construction
- Alteration to ground water
- Alteration to surface water
- Impact on threatened flora
- Impact on threatened fauna
- Impacts of climate change

1. Loss of vegetation to enable construction

The North East Link Project (NELP) acknowledges the loss of approximately 26,000 medium or long-term viable trees and plans to compensate by planting 30,000 replacements. Some of these replacements will be 'off-sets' in locations outside the local area which is of no value to local biodiversity and habitat and constitutes a net-loss of vegetation. Other replacements will be seedlings which will not provide faunal habitat or local climate change benefit for many decades. Some of the 30,000 will not survive which will constitute at best a 'no net loss' result. Tree planting needs to be done in conjunction with planting of understory and ground cover species to achieve reasonable habitat.

2. Alteration to Groundwater

The key findings in the Technical reports on groundwater are bespattered with terms such as "potential, possible, many, most, considered to be low" giving an overall impression of uncertainty and speculation. There are possibilities of altered salinity, exposure of acid-sulphate soils, incursion into contaminated soils, particularly during construction. We are concerned that there will be drawdown at Simpson Barracks, Banyule Flats and Bolin Bolin Billabong. This will impact on long term habitat viability

3. Alteration to Surface Water

Clarification is required regarding the design to replace 1.4 km of the northern section of Banyule Creek. There is confusing and inadequate information on management of water from the northern section of Banyule Creek, stormwater runoff from road surfaces in the trench and vehicle spill in the northern section.

Water management is not only of concern with regard to quality, we are concerned that water from the local catchment will be lost from the area and this will have a cumulative and long-term impact on local ecology.

4. Impact on threatened flora

A key population of the endangered Matted Flax-lily at the Simpson Army Barracks will be disturbed by translocation. Translocation will not recreate the rare Matted Flax-lily habitat that will be lost.

The most viable population of the endangered hybrid Studley Park Gum, located at the western edge of the Simpson Army Barracks, will be compromised. Mitigation and offset strategies outlined will not ensure the long term survival of the Studley Park Gum.

5. Impact on threatened fauna

The critically endangered Swift Parrot feed in trees at Macleod Railway Station. This priority habitat may be impacted by construction work in that area.

The Simpson Barracks is hunting territory for the Powerful Owl. Loss of prey habitat will reduce the hunting territory available to this species.

A population of listed migratory Latham's Snipe visits Banyule Flats wetlands annually to feed in the reed beds and mud flats. Alteration to hydrology in this area will impact on habitat.

Although thorough surveys were not carried out, the listed fish species Macquarie Perch and Australian Grayling are present in the Yarra River. Polluted runoff from road surfaces and muddy water from construction sites will be an issue for both species.

6. Impacts of climate change

The impacts of climate change are a growing concern especially in light of government inaction. We contend that the construction and operation of the NEL will contribute to climate change by encouraging the use of vehicles instead of public transport. Increased hard road surfaces, combined with loss of vegetation will increase local heat.

Conclusion

In this submission we have highlighted our concerns about the NEL with regard to protection of the natural environment.

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