



Blue Mountains Conservation Society Inc

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: (02) 4757 1872

E-Mail: bmcs@bluemountains.org.au Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

Mr Robert Greenwood
General Manager
Blue Mountains City Council
Locked Bag 1005
Katoomba NSW 2780
Email: council@bmcc.nsw.gov.au
Fax: 4780 555

Dear Mr Greenwood,

Submission

Springwood to Valley Heights Proposed Link Road Options

Blue Mountains City Council has identified four potential routes for a proposed link road from Peninsula Road, Valley Heights, via Lawson Road, to Hawkesbury Road, Springwood. The purpose of a link road is to alleviate the traffic congestion experienced on Hawkesbury Road and Macquarie Road during peak periods. A flora and fauna assessment for the proposal was undertaken by Applied Ecology in 2012.

The Blue Mountains Conservation Society thanks Council for the opportunity to make a submission in regard to the Springwood to Valley Heights Proposed Link Road Options. As you know, the Blue Mountains Conservation Society is a volunteer community organisation, with around 900 members, dedicated to conserving the World Heritage values of the Blue Mountains Region.

The Blue Mountains Conservation Society comments on the proposal are therefore limited to the environmental impacts of the options. The Society does not support any of the four proposed options for the following reasons:

1. Each of the proposed options will have adverse impacts on threatened ecological communities and species. Two endangered ecological communities which are listed under the NSW *Threatened Species Conservation Act 1995*, 'Blue Mountains Shale Cap Forest' and 'Sydney Turpentine-Ironbark Forest', will be directly adversely impacted. Blue Mountains Conservation Society notes that each of the above state listed

endangered ecological communities are considered to be critically endangered at national level. Both 'Blue Mountains Shale Cap Forest' and 'Sydney Turpentine-Ironbark Forest' form part of the 'Sydney Turpentine-Ironbark Forest' community which is listed as critically endangered under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*. The Applied Ecology flora and fauna report does not appear to recognise that the state listed 'Blue Mountains Shale Cap Forest' falls within the Commonwealth listing and is critically endangered. Each of the proposed options will therefore result in clearing of a nationally listed critically endangered ecological community. This is a major omission of the Applied Ecology flora and fauna report.

2. Council states that the 2012 Applied Ecology report has determined that the adverse impacts on threatened ecological communities and species are 'not significant'. The Applied Ecology report, however, does not address the Commonwealth Significant Impact criteria for critically endangered ecological communities which are:

An action is likely to have a significant impact on a critically endangered or endangered ecological community if there is a real chance or possibility that it will:

- *reduce the extent of an ecological community;*
- *fragment or increase fragmentation of an ecological community, for example by clearing vegetation for roads or transmission line;*
- *adversely affect habitat critical to the survival of an ecological community;*
- *modify or destroy abiotic (non-living) factors (such as water, nutrients, or soil) necessary for an ecological community's survival, including reduction of groundwater levels, or substantial alteration of surface water drainage patterns;*
- *cause a substantial change in the species composition of an occurrence of an ecological community, including causing a decline or loss of functionally important species, for example through regular burning or flora or fauna harvesting;*
- *cause a substantial reduction in the quality or integrity of an occurrence of an ecological community, including, but not limited to:*
 - *assisting invasive species, that are harmful to the listed ecological community, to become established, or*
 - *causing regular mobilisation of fertilisers, herbicides or other chemicals or pollutants into the ecological community which kill or inhibit the growth of species in the ecological community, or*
- *interfere with the recovery of an ecological community.*

This is another significant omission in terms of the Applied Ecology flora and fauna report, which potentially renders the conclusion invalid that the impacts of the four options are not significant.

The Blue Mountains Conservation Society believes that the clearing of the 'Blue Mountains Shale Cap Forest' and 'Sydney Turpentine-Ironbark Forest', is unacceptable. The Society believes that the likely impacts of the proposal are in fact significant because, consistent with the Commonwealth's assessment criteria, there is a real chance or possibility that the proposal will:

- reduce the extent of a critically endangered ecological community,
 - fragment or increase fragmentation of a critically endangered ecological community, and
 - interfere with the recovery of a critically endangered ecological community.
3. Assessment of environmental impacts should include an assessment of both direct and indirect impacts and all on-site and off-site impacts of a proposal. The Blue Mountains Conservation Society does not believe that likely indirect and off-site impacts of the proposal have been fully assessed as yet. The Society notes that the state listed 'River-flat Eucalypt Forest on Coastal Floodplains' occurs downstream of the proposal. Proper account of likely impacts on downstream water quality is required.
 4. To date, Council's assessment of the Springwood to Valley Heights Proposed Link Road Options includes no consideration as to what environmental offsets would be required should the project proceed. The Blue Mountains Conservation Society understands that Deanei Reserve, which would be adversely impacted by the proposed Route A, has itself been used in the past as an offset site to compensate for environmental losses on the Cumberland Plain.
 5. The 2012 Applied Ecology flora and fauna report presents a vegetation map for the area of the proposal. It appears that this map is derived from Council's 2002 native vegetation mapping (Blue Mountains City Council 2002). It appears that Applied Ecology has relied on this map to determine the areas of threatened communities to be directly impacted by the proposal. The Blue Mountains Conservation Society has raised concerns in the past in regard to the accuracy of Council's 2002 vegetation mapping and has worked with Council in order to try and improve the accuracy of the mapping. The Society understands that Council is currently undertaking work to provide more accurate mapping of the City's native

vegetation. The Society believes that the accuracy of the vegetation map included in the Applied Ecology report should be verified and consideration given to Council's current revision of the 2002 mapping in order that an accurate assessment of likely impacts on threatened ecological communities can be made.

6. The Applied Ecology flora and fauna report states "In view of the high conservation value of the assets on the study site and other constraints Applied Ecology recommend consideration is given to all viable alternatives to this development". The Blue Mountains Conservation Society believes that alternatives to the four proposed options, which do not have adverse impacts on critically endangered ecological communities and threatened species, should be considered as an immediate priority.

Yours sincerely,

A handwritten signature in black ink that reads "P. Ridgeway". The signature is written in a cursive style with a large, sweeping initial "P" and a long, trailing underline.

Peter Ridgeway
President
Blue Mountains Conservation Society
president@bluemountains.org.au

Reference

Blue Mountains City Council. (2002). Native vegetation mapping of the Blue Mountains City 2002. Blue Mountains City Council, Katoomba.