

# EcoNetwork Port Stephens

Should you have any queries, please email Sue, [deputyresident@econetworkps.org](mailto:deputyresident@econetworkps.org)

## FINGAL BAY LINK ROAD — CONSIDERATIONS FOR DEVELOPING YOUR PERSONAL SUBMISSION

Submit by 5pm Friday 11 December 2020 to [fingalbay@transport.nsw.gov.au](mailto:fingalbay@transport.nsw.gov.au)

This Guide has been prepared by EcoNetwork Port Stephens to assist in responding to the proposed [Fingal Bay Link Road Route Options, Nov 2020](#).

- The case for and against a Fingal Bay link road has been made for more than four decades, and the issues remain complex and contentious.
- This Guide reflects what the EcoNetwork Executive believes to be a position most consistent with the objectives and values of the Association and its members.
- Please use the key points below to help you write your own submission. Members are of course free to follow all or none of the suggestions in the Guide, and we also **welcome feedback** before we finalise EcoNetwork's submission.
- Personalise your submission—use your own words as much as possible and include your own observations, experiences and concerns. Personalised responses receive much greater weight.

We suggest you:

- support the need for a range of measures to manage traffic congestion in the Nelson Bay and Shoal Bay areas during peak periods
- specifically support improvements and modifications to the existing road network ("Option 3")
- strongly oppose costly and damaging road works through Tomaree National Park ("Options 1 and 2").

We believe acceptable transport, traffic and demand management solutions can be implemented without the need for either of Options 1 or 2. This will avoid extremely costly major roadworks, of dubious benefit, that would impact severely on the biodiversity, recreational and heritage values of Tomaree National Park and on our water security.

Options 1 and 2 can be expected to make the current congestion even worse as they will deliver more cars into an area already with insufficient car spaces and with negligible space for additional parking. Despite their high cost both options are predicted to save only a few travel minutes without apparent additional benefit.



## Key considerations include:

### Reducing the number of cars and enhancing public transport is critical to success for all options.

#### 1. Too many cars in congested areas near the Nelson Bay to Fingal Bay route

- a. **Neighbouring locations are congested at times:** For example, at peak seasons and weekends, Shoal Bay Road east of Government Road to Tomaree Head can be grid-locked, as can the Anna Bay area.
- b. **New roads bring more cars:** Options 1 & 2 bypasses, and/or widening Shoal Bay Road will only exacerbate this issue as more cars will come, and car-parking will continue to be insufficient. This is likely even if land for car parking became available at Tomaree Lodge, though this is a poor use for such important recreational land.
- c. **New roads soon fill up:** Even a completely new road (Option 1) would likely only provide temporary relief – experience shows that new roads just encourage greater car use and soon ‘fill up’.
- d. **Too many cars now:** There are too many cars on the road and insufficient car parking spaces.
- e. **The time has come to consider alternative transport futures, involving far greater use of public transport for visitors and locals.**
  - For instance, a fleet of free EV minibuses may be the cheapest and most sustainable long-term option to service the most heavily frequented sites between Fingal Bay, Shoal Bay, Nelson Bay and Salamander Central, extending to One Mile, Boat Harbour and Anna Bay areas which are also congested at peak times.
  - This will not only improve the sound and visual amenity for all residents along the traffic routes as well as supporting climate impact initiatives, it also enhances opportunities presented by the Tomaree Coastal Walk currently in planning, which is a NSW State initiative.
  - Short and long-term this is possibly the cheapest option and certainly the most environmentally sensitive and appropriate for an area promoted as *‘Incredible by Nature’*.
  - As the issues are most significant at peak holidays and seasonal weekends, a road user charge could operate during those times within a defined cordon area. Income generated would be dedicated to public transport services and facilities. Road user charges are widely recognised as one of the most effective ways to manage travel demand.

#### 2. Improve flow around the local road network

- a. Greater use of public transport, such as a frequent EV minibuses service, will contribute significantly to improved traffic flow throughout the Tomaree Peninsula.
- b. Even if Options 1 or 2 were implemented, most of the proposed works of Option 3 will be required and should be the first stage of any development.
- c. Option 3 linking Dowling St to Shoal Bay Road would have alternative route options as well as signage, junction priorities and road marking changes to the roads.

### Neither bypass road delivers a critical function

#### 3. Fire / emergency access is not advantaged

- [‘Have your say’](#)<sup>1</sup> indicates Option 1 would not provide improved access for fire and emergency services.
- Option 2 would not improve access in a bushfire and is unlikely to significantly assist emergency services in other circumstances, other than in the unlikely event of Shoal Bay Road being completely inaccessible, coinciding with a medical emergency (see also 8c below).
- Alternative emergency helicopter evacuation is an established and more efficient and cheaper option for the occasional high care needs than costly new roads.
- Both new road options would increase fire risk as they expose more of the Park to both deliberate and accidental sources such as cigarette butts and abandoned cars.

#### 4. Reduced travel time is minimal

- [‘Have your say’](#)<sup>1</sup> indicates Option 1 could potentially save (Fingal Bay) motorists more than 6 minutes travel time during peak hours, while Option 2 could potentially save motorists more than 3 minutes travel time.
- This time saving is not a sufficient benefit to offset either the incredibly high cost of these options in dollars, or the adverse recreational and biodiversity impact on Tomaree National Park, its Worimi heritage and its water security value.

---

<sup>1</sup> Transport for NSW, Fingal Bay Link Road, [Have your say - Route Options, Nov 2020](#) p2 beneath table says “Preliminary investigations have also indicated that Option 1 would not provide improve access for fire and emergency services.”

Both bypass roads will hugely and unnecessarily impact on national park values and potentially our water security

5. **A road through the park will not be a small scale low impact construction but a major engineering project, creating a massive visual barrier** – Both options 1&2 cross sand beds holding our water source. In particular, Option 1 impacts the Anna Bay borefields where 80% of Tomaree Peninsula obtains its daily water supply. Protecting our water is paramount – only Option 3 ultimately protects our water source. Elsewhere Hunter Water standards mandate a raised road built to contain drainage, thereby requiring extensive embankments. Typically roadworks are broadly cleared either side. A two lane road, each lane about 8m, with a 10m embankment and clearing either side — means a 40m swathe through the park, alienating sections of the park in an already compromised strip. And if the road was four lane – the number of lanes is not specified in the proposal – an even wider corridor would be involved. Visual and serenity values within the park would be severely impacted by both new road options and our water supply potentially compromised.

6. **Recreational value hugely impacted**

- An often unrecognised and unpromoted value is the recreational use of Tomaree NP. Many walkers, runners, cyclists and wildflower photographer access the park’s northern section in the Shoal Bay and Fingal Bay hinterland where an extensive track network extends to the Big Rocky Track.
- Option 1 alienates at least six access points and more tracks than Option 2 which would alienate four access points from the track network.
- The Option 1 corridor is in a favoured wildflower haven with the greatest diversity of orchids in the national park.
- The 1994 Environmental Impact Study (EIS<sup>2</sup>) surveyed at a time when wildflowers are least apparent and most orchids are dormant. It also did not recognise any recreational use of the park and the consequent plans have no provision to cater for this present day recreation and tourism use.
- Walking in the vicinity of a noisy road and under a tunnel is a poor experience.
- The numerous wide tracks offering varied walking experiences have become even more popular during the Covid 19 emergency. Both road options have major visual and noise impacts on recreational users seeking escape from urban living.

7. **Nature security: biodiversity and threatened species impacted**

- a. **Alienation and fragmentation** – While Tomaree NP occupies a substantial part of the peninsula, it is not very wide at any point. Option 1’s impact on biodiversity values is significant, with a longer road requiring significantly more clearing, and alienating a larger portion of the national park than does Option 2. In Option 2, the Shoal Bay wetlands, the most coastal of the Tomaree NP wetlands, would be alienated from the rest of the park; their connection with the sandmass further supports their important role in supporting biodiversity.
- b. **Biodiversity impacts are significant** – The 1994 EIS<sup>2</sup> identified 11 endangered fauna species found in the study area, which correspond to the current Option 1. Fauna fencing, fauna underpasses and other measures would facilitate some protection and north-south movement through the park, however wildlife collisions and impacts would still occur. The EIS revealed populations, for example koalas, carpet pythons etc., would be impacted, but numbers in 1994 were considered adequately protected elsewhere such as in Myall Lakes National Park ... *“Any loss of individuals is not expected to affect the overall population status of the species, including the Koala and the Diamond Python.”*
  - In the subsequent three decades that situation has dramatically changed, with continued habitat loss, urban encroachment and bushfires heavily impacting many species, and additional impacts of climate change unquantified. Most noteworthy currently are koalas, whose population security has plummeted. Wildlife in Port Stephens cannot tolerate more impacts on our nature reserves.
  - The EIS recognised the proposed route, now Option 1, near Kurrara Hill and the Nelson Bay Golf Course where koalas, pythons, various macropod species and a diverse range of birds are seen *“... to support a higher wildlife diversity and density than the eastern section, as well as a greater variety and higher quality of wildlife habitat.”* Since the EIS, the endangered Tomaree donkey orchid or Sand Doubletail, *Diuris arenaria*, has been identified, and is within the corridors of both Options 1&2. Option 1 would have significant impact on this endangered species. The Powerful Owl, listed Vulnerable, will be impacted by Option 2. Since 1994 additional species may now be threatened.
  - Option 3 clearly least impacts biodiversity.

---

<sup>2</sup> Sinclair Knight Merz, Proposed Fingal Bay Road Environmental Impact Study, prepared for Port Stephens Council, Nov 1994

- c. **Introduction of weeds and litter:** Roadside vegetation could be expected to suffer from littering and weed introduction, further impacting Tomaree NP's biodiversity value.

### Other considerations

#### **8. Consider options to reduce congestion on Shoal Bay Road**

- a. **Protect Shoal Bay Road** – Harden the foredune north of the road where dune and road are narrowest, and beach is eroding before more is lost to the sea. Left unchecked the existing road will eventually be undermined. Use modern 'soft' engineering techniques to ensure the marine environment is not impacted through sediment shifts and seagrass inundation.
- b. **Widen Shoal Bay Road** – Consider selective widening of stretches of Shoal Bay Road where practicable.
- c. **Enhance existing walk/bike path behind Harbourside Haven** to create a low cost alternative route only for emergency vehicles.
- d. **Traffic is sufficiently slow** to avoid the more dangerous high-speed vehicle accidents which are more likely to block road access than low speed accidents, reducing chance of a total road block.
- e. **Consider pedestrian access** options across Shoal Bay Road to help reduce traffic congestion.

#### **9. Increased development pressure on Shoal Bay and Fingal Bay with bypasses is undesirable**

Additional access to Shoal Bay and Fingal Bay, particularly by Option 1, would inevitably increase pressure for new development in the eastern villages. This would likely take the form of pressure both for a larger development footprint and for increased density and building heights. Landowners, including public authorities may well seek rezoning, reclassification, and changes and variations to development standards including height limits. Residents and visitors need to decide how much change to the character of these local communities they see as desirable, and how an additional road access would contribute to the pressures for change, which would also bring more cars and demand for parking in highly constricted areas.

#### **10. What evidence of congestion?**

While 'lived experience' of many residents suggests a congestion problem, planning should be informed by actual evidence, of existing and forecast traffic flows, and parking demand, relative to the capacity of the existing and proposed roads. Such evidence would also demonstrate the periods of the week/year during which the congestion is a significant problem.

This submission guide was developed by EcoNetwork Port Stephens and is supported by National Parks Association of NSW (Hunter Branch)

#### **How to make a submission:**

Send by email to:

Fingal Bay project team

Transport for NSW

[fingalbay@transport.nsw.gov.au](mailto:fingalbay@transport.nsw.gov.au)

#### **Closing date:**

Lodge your submission by 5.00 pm on Friday 11 December 2020.

#### **Send a copy to**

- **Kate Washington** at [portstephens@parliament.nsw.gov.au](mailto:portstephens@parliament.nsw.gov.au)
  - if you live within the Port Stephens electorate, send her a copy as the Member for Port Stephens.
  - If you live outside the Port Stephens electorate, send her a copy as the Shadow Minister for Environment and Heritage.
- **John Graham MLC.** Shadow Minister for Roads, [john.graham@parliament.nsw.gov.au](mailto:john.graham@parliament.nsw.gov.au)

Should you have any queries, please email Sue, [deputyresident@econetworkps.org](mailto:deputyresident@econetworkps.org)