



25 September 2014

Reference: Grafton Bridge
Contact: David Morrison

The Senior Planner - Roads
Infrastructure Projects
Department Planning and Environment
GPO Box 39
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Dear Michael

Comments on EIS - Second Crossing of the Clarence River at Grafton
Your Ref : SSI - 6103

Attention : Joanne Glass

Thank you for the opportunity to comment on the EIS for the second crossing of the Clarence River at Grafton.

Given the opportunity for Council's issues to be identified through the route selection and preliminary draft EIS stages of the project, Council does not have any major objections to raise at this stage, acknowledging that some issues identified in the following are anticipated to be addressed at detailed design stage.

Nevertheless, it would be appreciated that the following comments be taken into consideration in the review of the EIS :

Flood Impacts

- The EIS identifies raising of the levee by up to 200mm, but it is not clear whether this is a uniform raising of the whole levee or a maximum raising at identified low points
- The EIS has not addressed the practicality or feasibility of raising the levee given that there are a number of logistical constraints such as buildings. Therefore it has not been demonstrated that raising of the levee to ameliorate afflux impacts from the bridge is able to be implemented.
- The EIS has identified ameliorative measures to address impacts from a 1% & 2% AEP event, however it is not known whether there will be different impacts from a range of other events.
- The sizing of the proposed Pound Street pump has not been explained or justified so Council cannot assess whether it is too large or small.
- Given the hydraulic height difference upstream and downstream of the bridge in the existing model, the flood assessments needs to confirm that the downstream levels will not increase as a result of the second bridge (i.e. if that hydraulic difference was maintained, there would be an increases downstream

commensurate with the afflux – if so, that could have significant impact on overtopping behaviour in extremely sensitive areas such as Dovedale).

- The flood assessment (option 2) seems to indicate that for the 2% AEP event, with ameliorate levee raising, will increase flood levels in some parts of South Grafton (eg Abbott Street and Vere Street) and overtopping volumes by 3%. The assessments need to clarify and indicate how these impacts are proposed to be managed as it the understanding of Council and the community that there was to be no negative impact from flooding from the Clarence River as a result of the construction of the new bridge.
- The indicative "visualisations" of aesthetic treatment of the levees where they have been raised include landscape treatments and tree planting on the levee structure. Council would not favour this approach for reasons of structure integrity and maintenance and to avoid raising erroneous expectations, would prefer these representations to be modified.

Ownership of assets

- The EIS is silent on the long term ownership of a range of project related infrastructure such as open space and landscaping required to ameliorate visual impacts, draining infrastructure (in particular the propose Pound Street pump), etc. Clarification of these matters will be required through negotiation at detailed design stage, it being noted that it is Council's view that such matters are integral to the road project and therefore should not impose a maintenance burden on Council.
- Council access to existing infrastructure needs to be taken into account in detailed road design, eg at the Heber Street levee.

Road Issues

- Heber Street catchment – the design indicates significant road raising and embankments generally in this area, particularly in the vicinity of Bunnings and the Heber Street levee. It is not clear whether Council's major pump at the levee has been taken into account or how the effect on the drainage characteristics in that area have been addressed. As this is a small catchment very sensitive to changes in drainage, a more detailed assessment of the impact of the roadworks on that catchment is considered necessary.
- The EIS has not identified a staging plan. Council sees potential for staged works to address existing traffic issues as an opportunity. Also, the staging of levee works in relation to other construction activities needs to be clarified.

Thank you for the opportunity to comment. Council would welcome the opportunity to be involved in detailed design stage to address more specifically some of the issues raised above and any others that may arise.

If you require further information please contact me on telephone 66 430 204.

Yours faithfully



David Morrison
Manager Strategic & Economic Planning