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Dear Madam/Sir

Submission – M1 Pacific Motorway Extension to Raymond Terrace (SSI 7319)

I wish to make a submission in relation to the state significant infrastructure project to extend the M1 Pacific Motorway to Raymond Terrace and currently on public exhibition (SSD 10315 – EPBC 2020/8288). This proposal seeks approval for a 15 km extension of the existing motorway including a 2.6 km bridge over the Hunter River and floodplain.

The documentation identifies four project objectives to (1) improve travel time and road network efficiency, (2) provide improved long term route reliability along the M1 Pacific Motorway corridor in relation to congestion reduction, flood immunity and high demand holiday peak travel, (3) improve road safety for all road users, and (4) provide more efficient access to facilitate regional economic growth.

An additional objective of the project should be to achieve net zero carbon emissions through design, construction and operation.

Specific comments on the proposal outlined in the environmental impact statement (EIS) are described in more detail below.

Biodiversity impacts

1. Biodiversity is a critical impact of the proposal. In an already substantially cleared and fragmented natural landscape, a further 174 ha of a diverse range of natural habitats and vegetation types will be cleared, including 136 ha of listed Threatened Ecological Community. This represents a significant impact. Opportunities to further reduce this impact should be investigated.
2. The biodiversity assessment and report has been undertaken appropriately, and appears to provide a reasonable assessment of biodiversity impacts. It should be noted that the proposal will contribute to increasing regional habitat fragmentation and biodiversity loss, including significant impacts on some threatened species and wetland areas.

3. While biodiversity offsets to compensate for the expected losses of biodiversity have been identified, the provision of offsets for this project has not been secured. Such offsets should be located as close as possible to the site of the development as possible. Given the size and scale of the offsets required, and the difficulty of finding these, a payment to the Biodiversity Conservation Fund in lieu of offsets is not appropriate and should not form part of the project proposal.
4. Biodiversity offsets to compensate for project impacts should be secured in advance of project commencement to ensure that there is no time lag between the time of impact and the provision of compensatory measures.

Carbon emissions

5. It is pleasing to see that a comprehensive assessment of greenhouse gas emissions relating to the project has been undertaken in the Climate Change Risk Working Paper and EIS. Missing from the documentation however, is how the proposal can have a net zero carbon impact, and a commitment to offsetting carbon emissions arising from the project.
6. Any approval for the proposal should be on the basis that carbon emissions attributable to the operation, maintenance and decommissioning of the proposal are fully quantified and offset using an appropriate mechanism. This includes embodied energy in materials, fossil fuel use for transport and management, road maintenance, waste disposal, land management costs and associated transport.
7. The proposal should not proceed unless it has a net zero carbon contribution, both in construction and during operations.

Integration with Lower Hunter Freight Corridor

8. Integrated impact assessment should have been undertaken for both the M1 Motorway extension and the proposed alignment of the Lower Hunter Freight Corridor.
9. The combined effects of both projects is much greater than each individually, especially in impacting on long term biodiversity and habitat connectivity in the Lower Hunter region. In particular, designing projects concurrently can lead to improved long term land use outcomes.
10. Integration with the Lower Hunter Freight Corridor should have been considered in detail in the cumulative impact assessment.

Cumulative impacts

1. The cumulative impacts identified in EIS Chapter 23 are based only on identification of ten projects. This ignores other significant impacts, especially allowed for under regional and local planning strategies, and continuing land use change such as progressive loss of biodiversity through land clearing.
2. However, the most significant potential cumulative impact of the project is its impact on encouraging more travel and longer distance travelled. This is not considered and has the potential for significant longer term impacts on urban development and increasing demands for more roads and carbon emissions.

Essential criteria for the approval of new transport infrastructure projects such as the M1 Motorway extension should be as follows:

1. Designed to avoid biodiversity loss, to prevent increased fragmentation of natural areas, and to achieve no net loss of biodiversity within the local area.
2. Any required biodiversity offsets are to be provided or secured in advance of the development being approved.
3. Achievement of zero net carbon emissions during construction through offsets, in addition to a positive carbon emission balance following commissioning and over the lifetime of the project.

Please ensure that the matters outlined above are taken into account in the assessment and determination of the proposal.

Thank you for the opportunity to make a submission.

Yours sincerely

Martin Fallding

22 August 2021