

RMS SUBMISSION – INNER COASTAL ROUTE and the SEPTEMBER 2018 CONCEPT DESIGN

SEARS mapping – Desired Performance Outcome

1. **Environmental Impact Assessment Process – The RMS (and previously the RTA and representatives) has not conducted the project in a transparent and balanced manner.**
 - Despite strong community and council support for a western bypass, the RMS and government have continued to pursue the Inner Coastal Route (effectively a high-speed motorway) running through the west of Coffs Harbour. For example, numerous demonstrations, submissions, survey results, etc. have occurred and been largely ignored.
 - Dismissed the major socio-economic impacts to Coffs Harbour and its residents that will have far reaching implications from a development and growth standpoint despite the recognised and increasingly important role of Coffs Harbour as a fast-growing regional hub and highly desirable location for ‘sea changers’, retirees and families as a lifestyle choice.
 - Continued to misrepresent the proposed Inner Coastal Route as a Coffs Harbour bypass when in fact it traverses the west of Coffs Harbour and does not support the premise of a bypass misleading many in the community.
 - Has not produced or released critical information (e.g. EIS and underpinning reports) necessary for the community to make an informed decision on the proposed Inner Coastal Route.
 - Has continuously presented information on the route in a sanitised and skewed manner effectively obfuscating representations of how the Inner Coastal Route will impact Coffs Harbour from a visual standpoint. E.g. 3D models removed from public displays when deemed polarising, housing estates blanked out of artist renditions and vegetation portrayed in rocky areas that will be unable to sustain plant life of any significance.
 - Ongoing and covert incremental changes to planning, design and routes that are neither highlighted nor readily apparent to a lay person.
 - Removal of tunnels from the plan was given without quantified and reasonable substantiation.
2. **Environmental Impact Statement – The RMS has not provided the community with an EIS despite 18 years of planning activity.**
 - Labels such as preferred and proposed offer no sense of certainty as to what will be delivered.
 - Alternative options for a highway upgrade location were dismissed with minimal information provided to the community apart from in some cases costings which did not map to any detail.
 - Interchanges are not workable given tight turning circles and insufficient information as to how they will integrate into existing roads (particularly Coramba Road), bike routes, etc.
 - Staging methods and route have not been provided including machinery access and transportation of equipment, personnel and construction supplies.
 - Mitigations to address environmental destruction and disturbance are not provided and those that are will not be reasonably effective.
 - Mitigations to address socio-economic impacts including noise, pollution and visual disturbances are not clearly outlined nor are they complete.
 - Progress of the project does not follow a logical methodology. For example, land is being acquired despite incomplete resolution of the proposed route, impacts and mitigations. The immediate community is in a state of limbo and anxiety and is being held to ransom by the RMS through confidentiality agreements and secretive heavy-handed negotiations leading to deep divisions, hostility and contention in the community.
3. **Assessment of Key Issues – The RMS has not provided quantitative and qualitative measurements of impacts.**
 - Mandatory impact assessments have not been provided to the community for review despite that they are precursors necessary for informed decision making.
4. **Consultation – The RMS has conducted displays and community feedback sessions however has not supplied sufficient information for informed decision making.**
 - Affected individuals, groups and residential areas have been provided with limited information and feedback over the eighteen-year period and widely reflected community and council dissatisfaction with the Inner Coastal Route has been ignored by the RMS and government.

SEARS mapping – Key Issue and Desired Performance Outcome

1. Transport and Traffic – The RMS has not provided detailed reports.

- The close proximity to residential areas requires clearly outlined mitigations to minimise disruption to road access including public transport and bicycle paths enabling residents to move around with safety and reasonable convenience, particularly given the multi-year works anticipated. This information has not been provisioned.

2. Noise and Vibration – Amenity – The RMS has not provided detailed reports.

- Noise and vibration are issues both during road construction and when operational however the RMS has indicated that minimal to no mitigating controls will be implemented during the highway construction period.
- The valley location of the Inner Coastal Route will act as an amphitheatre and the RMS has acknowledged that there is no mitigation solution for adequately controlling traffic and construction noise apart from remediation of individual properties.
- Remediation comes in the form of double glazing and air conditioning which ultimately diminishes the quality of life for residents who can no longer enjoy the amenity of the sub-tropical climate and the outdoors. The running of air conditioning is at the resident's cost which over time can expose them to financial stress in terms of power bills and unit repair/replacement/update given the lifespan when operating 24x7 during warmer seasons in particular would not be expected to last beyond 5 years.
- The population in Coffs Harbour has progressively moved west so many thousands of properties would be impacted by noise and vibration but the RMS has not quantified this total. Additionally, the RMS has indicated that the council should not have approved western developments so it is unclear whether properties built subsequent to 2004 will be considered by the RMS from a mitigation standpoint.
- Traffic noise will be considerably louder in the west than on the existing highway through Coffs Harbour given the speed limit will be 110kms instead of 60 kms per hour. Trucks will labour up gradients of 4-6% increasing engine noise and then downhill noisy airbrakes will be invoked. A significant proportion of long-haul trucks alongside other motor vehicles have installed non-standard and non-compliant exhaust systems which are typically not legal and are not being policed in the region causing a major and unnecessary disturbance to residents.

3. Noise and Vibration – Structural – The RMS has not provided detailed reports.

- The method of road construction has not been disclosed, for both tunnels and open cut. The close proximity to residential areas and steep hill gradients poses a significant risk of landslides and damage to hundreds and possibly thousands of properties with associated safety issues.
- Noise and vibration are issues both during highway construction and when operational however the RMS has indicated that minimal to no mitigating controls will be implemented during the highway construction period.

4. Biodiversity – The RMS has not provided detailed reports.

- Highly significant and unique remnant bushland and koala habitat rated at the highest level of environmental protections will be destroyed or located in close proximity to high-speed traffic with no indication of any mitigating measures. Remnant bushlands are located along MacKays Road and Bruxner Park Road.
- Proposed wildlife crossing corridors cannot link back into remnant bushland given it will be destroyed therefore such mitigations will be rendered ineffective.
- Mutton bird migration is at risk with young birds potentially disorientated by head lights shining throughout the night high up on the ridgeline.
- Tunnels would provide some mitigating benefits to wildlife and remnant bushland preservation.

5. Urban Design – The RMS has not provided detailed reports.

- The Inner Coastal Route poses major and irreversible constraints on development, growth and amenity for Coffs Harbour.
- The Coramba Road interchange integration into the local area and the existing road system appears to be left for council to resolve. Coramba Road and West High Street offer minimal

scope for upgrade unless there are significant land acquisitions undertaken which do not appear to have been coordinated and agreed with the Coffs Harbour City Council and local community.

- The RMS has indicated that given the valley location, solutions to highway impacts such as noise, pollution and headlights are generally not available.
- Trees that protect residential properties and farmland from strong winds, particularly elevated properties in ridgeline areas, will be removed to make way for the highway and cannot be re-established at all or at best only in the long term potentially exposing property and farm land to wind damage, erosion and safety risks.

6. Visual Amenity – The RMS displays do not provide sufficiently accurate visual clarity across the highway route.

- Artist renditions do not provide realistic nor accurate portrayals of the finished highway.
- Existing features including housing estates are missing from renditions and mature trees are portrayed that cannot possibly or safely grow in steep rocky locations.
- No mitigations are in place to shield headlights at night time from residents.
- The iconic and unique Great Dividing Range backdrop of Coffs Harbour will be irreversibly scarred and defaced with the construction of the Inner Coastal Route permanently diminishing its natural beauty and tourist appeal.

7. Socio-economic, Land Use and Property – The RMS has not provided detailed reports.

- The scale of socio-economic impacts has not been quantified but is reasonably anticipated to negatively affect 1000s of properties and many more residents. There is no justification as to how the socio-economic cost is measured against the project benefits.
- Many residents located towards the east of Coffs and in the vicinity of the existing highway experience major negative impacts from the current highway. This serves as a prelude to conditions that will be moved across to the west of Coffs Harbour.
- The proposed Inner Coastal Route does not mitigate an unacceptable highway situation but rather relocates it to another area of Coffs Harbour in the west thus not resolving a serious problem in Coffs Harbour. In fact, this will introduce another busy road into the city given much of the day time traffic is local making traffic noise and pollution ubiquitous to the whole town.
- The community has become deeply divided by RMS's drawn out process and general disregard for their concerns. The focus has turned inward looking such that individuals are pursuing perceived benefits to themselves at the expense of neighbours and the wider community. The Inner Coastal Route even prior to construction, is damaging the fabric of the Coffs Harbour community to the point where some residents are fearful of speaking out about their concerns.
- Many farms in Coffs Harbour are long established and are on relatively small land allocations that will cease to be viable in the event of highway encroachment resulting in loss of livelihoods.
- The uniqueness of the Coffs Harbour region, the sheltered valleys and respective specialised farming techniques with the benefit of close proximity to infrastructure does not exist anywhere else beyond the Inner Coastal Route path or otherwise established farms in the region. There are no opportunities with commensurate conditions for displaced farmers to pursue their livelihoods in alternative locations in this region given the demand for residential developments on available land forcing them to either relocate far afield or start a new career.
- Many farms have existed within the same family for generations and older farmers in particular will experience significant disadvantage and psychological hardship and may not in fact be in a position to restart their lives in a new location and industry. Many farmers lives are tied to their work which cannot be mollified by financial compensation for their loss.
- Farming is a valuable economic contributor and is in fact iconic in the region celebrated by the landmark Big Banana complex. The Inner Coastal Route is detrimental to the success of farming in the region. Apart from reducing the availability of viable farm land, pollution in the form of diesel particulates other pollutants associated with highways as well as risk of damage to the water table during construction and ongoing road vibration, may undermine the value, reputation and productivity of Coffs Harbour farms and their produce.
- The rural amenity enjoyed in the west of Coffs Harbour that serves to make this a desirable place to live and that attracts real estate value and development will be compromised irrevocably under the shadow of a high-speed motorway. The potential for optimised property values in what is currently prime real estate in a growth corridor with mountain and ocean views will be

diminished significantly and permanently. Many residents in the west of Coffs Harbour have moved from urban city areas to enjoy the amenity and lifestyle that is now under threat.

- As concerns are raised about the impacts of the highway, concerned residents in west Coffs Harbour are increasingly preparing to list their homes for sale with property values either not growing or dropping as fears mount. Real estate agents, conveyancers and the council are not forthcoming in terms of buyer awareness of the Inner Coastal Route and potential impacts to surrounding residents. Property buyers from further afield who are not being adequately served by duty of care from the property industry and council are particularly vulnerable in their property acquisitions. Many established residents are not familiar with the Coastal Inner Route location so outsiders are particularly disadvantaged.
- West Coffs Harbour has a significant proportion of residents that have relocated from big cities, other towns and countries to purchase prime real estate that enjoys ocean and mountain views within healthy, clean, peaceful surroundings at a comparatively affordable cost. These lifestyle benefits will be diminished with the construction of the Inner Coastal Route given that traffic, noise and pollution are what city people are often seeking to escape. In effect, deterring people who are looking for an idyllic lifestyle and that have significant funds to invest locally.
- Community and Coffs Harbour City Council consultations facilitated by the RMS appears to have been conducted to satisfy a requirement rather than to obtain genuine and meaningful insights. Over time, the highway design has become increasingly insensitive to the region and community and more focused on the quickest, easiest and cheapest solution. The government has argued that this is an expensive piece of the Pacific Highway upgrade however in context, this is a feature of the natural geological and geographical features. The government must accept that where some parts of the highway were cheaper to build, Coffs Harbour will be more expensive and must be funded accordingly without budget saving shortcuts that will compromise the future of the town and its residents.

8. Heritage – The RMS has not provided detailed reports.

- Highly significant indigenous heritage landmarks across the ridge will be destroyed in the event of open cuts for the highway which the RMS appears to have proposed without consultation with local indigenous communities.
- The Coffs Harbour community has invested a great deal of time and commitment into reconciliation to remedy historical failings of European intervention in this area and now enjoys a well engaged, valued and respectful relationship between the indigenous and non-indigenous communities. It is inconceivable that this significant progress and cohesive relationship should be threatened by the thoughtless and insensitive construction of a highway through lands that are embedded in indigenous folklore and song lines.

9. Soils – The RMS has not provided detailed reports.

- The region regularly experiences seasonal heavy rainfall and proposed steep open cuttings pose a risk to soil washing away, erosion and pollutants affecting water quality and sediment accumulation in the many creeks and ground water in the area. These water bodies support farms and their livelihoods as well as residents, wetlands, wildlife and wildlife corridors.

10. Water Quality – The RMS has not provided detailed reports.

- See previous point.
- Many properties within close proximity of the Inner Coastal Route depend on tank water collected from rooftops that will be affected by dust and chemicals from the construction process and pollution and heavy diesel particulates once the road is operational. No mitigating measures have been determined or proposed to protect the water supplies of affected residents both during construction and when operational.

11. Water Hydrology – The RMS has not provided detailed reports.

- See previous two points.
- Given the geological complexity of the Inner Coastal Route location, there is no confirmed means of fully ensuring that surface water and more critically the water table are not compromised during road construction or from ongoing vibrations once operational.

12. Flooding – The RMS has not provided detailed reports.

- Flooding during heavy rains has occurred on various occasions in the valley around MacKays Road near the train line. The removal of trees, soil erosion and deep cuts into the hillside would expose the area including the railway and properties below the highway to a higher likelihood of flooding due to increased volumes and speed of runoff. Existing water detention basins do not service this location and will not assist with flood management.

13. Air Quality – The RMS has not provided detailed reports.

- Much of the highway location traverses a valley or basin, heavy diesel particulates, many pollutants, dust, etc. are heavier than air and in the absence of wind will fall onto the surrounding properties, farms and water ways. It is not uncommon, particularly at night with the inversion layer that cloud, fog and smoke suspend in the air and form a blanket across the valley. No amount of mitigations can change this meaning that pollution levels will increase and settle in the area affecting the health and wellbeing of residents and the desirability of living in the west of Coffs Harbour.
- Residents located along the existing Pacific Highway route in Coffs Harbour experience unacceptable levels of pollution from passing traffic with trucks being of particular concern such that opening windows, enjoying the outdoors and even washing clothes becomes hazardous. Relocating the highway to the west of Coffs Harbour will transpose the air pollutants to populated residential areas within a valley that does not benefit as greatly from coastal winds to displace pollution. It is therefore reasonable to assert that the pollution will be even worse in the west of Coffs Harbour.
- A hospital, respite centre, retirement village, preschools and college are all located within the valley location that will be overshadowed by the Inner Coastal Route exposing frail, weak, ill and children to pollution and health issues that otherwise does not exist in the existing suburban and rural settings. People who are vulnerable to pollutants who reside in west Coffs Harbour to enjoy the healthy lifestyle may be in fact forced to move to preserve their health and wellbeing.

14. Waste – The RMS has not provided detailed reports.

- Being a large-scale construction project over 4-5 years in the west of Coffs Harbour, it is expected that there will be major disruption to the residents and the area by trucks and road workers on an ongoing daily basis with the movement of materials coming in and out of the construction sites as well as potential spills and mishaps. It's reasonable to estimate that tens of thousands of truck trips will traverse west Coffs Harbour over the duration of construction. Existing roads are already of a poor quality with inadequate maintenance from council which will only deteriorate further under the additional pressure of mass truck movements introducing greater risk of accidents and loss of amenity.

15. Sustainability – The RMS has not provided detailed reports.

- See previous point.
- The location of the Inner Coastal Route with its deep cuts and unsympathetic alignment to the landscape will produce significant amounts of waste and is intrinsically poorly designed from a sustainability standpoint.

16. Safety and Risk– The RMS has not provided detailed reports.

- See points 7 and 13.
- The proximity of the Inner Coastal Route to residential areas exposes the surrounding residents to increased levels of pollution and toxic materials that will settle in the valley location.
- Farm land and produce will have increased exposure to contaminants, diseases and pathogens from passing traffic carrying animals, plants and food.
- In the event of an accident where traffic will be travelling at 110kms per hour, the scale of accidents will expose surrounding residents to spills, smoke and distressing noises.
- The RMS has removed tunnels from the latest design on the basis that trucks carrying hazardous goods will be permitted to use the Inner Coastal Route. Regulation would disallow this if tunnels were to be traversed. Given an estimated daily 12-20 such vehicles passing through (without the need to stop) Coffs Harbour and that no major accidents involving hazardous vehicles have occurred, this is a disingenuous and cynical reason to save money and expose the residents of Coffs Harbour, farmers, the indigenous community and the environment to a significantly compromised outcome.

Conclusion

Over the 18 years that this project has been underway, the RMS has conducted themselves without sufficient transparency, due diligence and genuine community consultation. This has led to a community divided, people feel confused, angry, anxious, desperate, fearful and a sense of hopelessness. There is a lack of confidence in the RMS and government and the general perception is that cost reduction is the over-riding priority at the expense of socio-economic, environmental and indigenous impacts. In essence, Coffs Harbour will be sacrificed so the government can save money.

It is clear that even without having been provided with the necessary assessments, measures and reports from the RMS, the Coastal Inner Route would have significant and irreversible impacts to 1000s of residents in terms of negative effects on amenity, real estate values, health and wellbeing. Additionally, the last remnant bushland in Coffs Harbour and indigenous landmarks of major significance would be lost forever. Impacted farm land will be reduced in size such that farmers will lose their livelihoods and the legacy of generations of their forebearers.

The Coastal Inner Route will redefine the boundaries of Coffs Harbour constraining development and growth into the future and compromising highly desirable prime real estate which will either become part of the motorway or so impacted by its proximity that it will be diminished in value and appeal.

Coffs Harbour is a highly desirable place for families, retirees and immigrants seeking to relocate given it is an extremely well serviced regional area with unique natural assets that offer idyllic, healthy lifestyle choices. The construction of a highspeed motorway through the west of Coffs Harbour over shadowing the town, projecting traffic noise, pollution and headlights 24x7 will reduce its appeal as a preferred place to live and the money that attracts.

The unique and enviable position that Coffs Harbour holds as the only place in Australia where the Great Dividing Range meets the ocean is an asset worthy of protection. Arguably, it is our obligation to protect this backdrop and it is reasonable to view the construction of a high-speed motorway as an act of vandalism if build in this iconic location.

Coffs Harbour is the most important regional hub between Newcastle and the Queensland border. The population is growing exponentially and since the RTA/RMS project's inception in 2000, the population has grown roughly 35,000 people, many of whom live in the west of Coffs Harbour. Additionally, Coffs Harbour is now classified as a city and attracts the substantial attention and investment accordingly. Coffs Harbour is a multi-faceted town with attractions ranging from tourism, agriculture, business, sports and plays host to national and international events. It is critical to protect the attributes that have enabled Coffs Harbour to become so successful as a city and to construct a high-speed motorway through this burgeoning town will in all likelihood stifle or reverse this trajectory of development and growth.

Recent changes to the Coastal Inner Route have seen the removal of 3 proposed tunnels. These tunnels were strategically located to minimise impacts across all identified problem areas including noise, lights, pollution, livelihoods, indigenous heritage and the environment. The construction of tunnels serves as an important mitigation but is considered as the very bare minimum given the route follows a valley that in effect acts as an amphitheatre. 90% of the Inner Coastal Route would be open road and the construction of tunnels would offer no mitigating respite. Significant additional noise and light mitigations across the full route are necessary to bring the impacts to a tolerable level. But to reiterate, these measures will never address the major socio-economic impacts to the community and strategic development and growth of Coffs Harbour into the future. As such, tunnels are better than no tunnels but the Inner Coastal Route is fundamentally problematic to the town.

In conclusion, the Coastal Inner Route is an overwhelmingly inappropriate development for the region and offers a highly flawed and problematic solution to the traffic issues that are confronted in Coffs Harbour. The manner in which the project has been conducted thus far demonstrates that the government stakeholders and RMS are not fit to manage this important infrastructure project and

make strategic value decisions to invest in and support the best interests of the Coffs Harbour region.

A western bypass has historically been the preferred route for Coffs Harbour residents and the Coffs Harbour City Council, and for obvious reasons. In 2004, the RTA/RMS acknowledged that a western bypass was a strategic option in 20+ years. Given we are nearing that twenty-year mark and that it is indisputable that the Inner Coastal Route presents major and irreversible negative impacts to Coffs Harbour and its residents both now and into the future, particularly in the absence of tunnels, I submit that the RMS cease plans for the Inner Coastal Route as they stand and reinstitute the project on a preferred and more appropriate western bypass route.

Details of submitter	
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