

Attention: Director Infrastructure Projects
Major Project Assessment
Department of Planning & Infrastructure
GPO Box 39 Sydney, NSW 2001

From: Craig Tosomeen
29 Cedar St
Evans Head, NSW 2473

February 15, 2013

RE: Woolgoolga to Ballina Pacific Highway Upgrade Project
Environmental Impact Statement December 2012

Dear Director.

I would like to make a submission on the above referenced project. I object to the project as proposed as I find that it would result in adverse unmitigated impacts and is inconsistent with the original design objectives. The portions of the design that I object to are: 1) The design of Broadwater Interchange and 2) the proposed variations of flood immunity levels provided to the new highway.

The current design of the Broadwater Interchange provides for exit and entry opportunities for highway motorist going south or traveling north from Broadwater only. There are no entry or exit opportunities proposed for highway motorist traveling north or traveling south from Broadwater. I believe that providing only half an interchange at this location has a large unmitigated adverse impact to the town of Broadwater, the Broadwater Sugar Mill and motorist traveling between Broadwater and Woodburn.

The adverse impacts of this proposed design are:

- A) Severely limits the commercial opportunities for businesses currently in Broadwater and any future businesses within the town. Only half of the possible traffic is eligible to exit and do business in the town. Once that half of the possible traffic exists the highway there is no possible way for them to continue their journey past the town. The proposed design is the worst of all possible exit configurations for the businesses in Broadwater.
- B) There are sugar growing farms that reside between Broadwater and Woodburn. The proposed exit configuration does not allow these farms to effectively transport their sugar cane to the Broadwater Sugar Mill.
- C) The section of the Highway between Broadwater and Woodburn is provided with emergency services from Evans Head, specifically NSW Fire and Rescue and Ambulance Service. With the proposed design any roadway crashes just south of Broadwater will require emergency service from Evans Head to drive to Woodburn, drive south of Woodburn to the Gap Road interchange, and then proceed north to Broadwater. The

proposed design will add 15 to 20 kilometers to emergency response vehicle travel routes, with a corresponding increase in response time.

I believe the proposed mitigations numbered SE4 and SE14 do address these adverse impacts of the proposed Broadwater Interchange.

The current flood immunity level proposed for the new highway varies between an Average Recurrence Interval (ARI) 20-year and ARI 100-year. It appears that the flood immunity level to be provided was decided by how much it was going to cost for each section. I believe this design approach does not meet the objectives of the Pacific Highway upgrade project as described in the Environmental Impact Statement, specifically the project will "Provide best value for money " and "Provide a route supporting economic development". My concerns are:

- D) The highway is vital to the economy of eastern Australia. The highway only operates at the lowest level of flood immunity that it is provided with. It is inconsistent to provide some sections of the highway with higher levels of flood immunity levels than others, if they have the same alternative flood proof transportation route. Once the highway is blocked due to flooding the entire section is blocked. The best value for money roadway would be to provide a consistent level of flood immunity between alternate route locations. Thus if the Clarence River floods the alternative flood proof route is from Woodburn to Lismore to Casino to Grafton and to Woolgoolga. So the entire roadway section between Woodburn and Woolgoolga should have the same flood immunity level. Sections that have higher flood immunity levels are overbuilt and bad value for money.
- E) A flood immunity level of ARI 20-year results in an approximate probability of 5% in any given year that the roadway will be flooded. The current standard for acceptable risk for normal structures is 1% probability in any given year. Given that the highway is vital to supporting the economic development of eastern Australia I find it inconsistent with the design objectives that some sections of the roadway have 5 times the current level of normally accepted risk to flooding. Providing sections of roadway with an increase flooding risk over normal standards does not provide a roadway which is supportive of economic development.
- F) The EIS indicates that an adaptive management approach will be taken to climate change, sea level rise and by default flood immunity levels. The EIS indicates that if the roadway experiences flooding events then additional upgrades will be planned and implemented to reduce the flooding risk. The EIS indicates that a relative small sum of additional money would be required now to reduce the flooding risk. I believe that the best value for money design would provide for a higher level of flood immunity now and in order to save the adverse impacts to traffic of flooding events, the additional expenditure of funds for studies and design at a later date. The adaptive management approach proposed in order to justify the sections of lower flood immunity roadway does not

consider the social and political cost if the highway must be upgraded again in a relatively short period of time. The money to upgrade the highway a second time is much more difficult to obtain and the original project is seen as having failed, it is not seen as having saved money by using an adaptive management approach.

In summary the proposed variation of the flood immunity levels provided by the project design does not meet the project objectives of best value for money and providing for economic development. All of the roadway should have a flood immunity level of ARI-100 year.

I appreciate this opportunity to raise my objections to the proposed Woolgoolga to Ballina Upgrading the Pacific Highway.

Sincerely

A handwritten signature in black ink, appearing to read 'Craig Tosomeen', with a long, sweeping horizontal stroke extending to the right.

Craig Tosomeen