

816 Bagotville Road  
BAGOTVILLE NSW 2477

18 February 2013

Department of Infrastructure and Planning,  
Major Projects Assessment,  
GPO Box 39,  
SYDNEY, NSW 2001  
Email: Plan\_comment@planning.nsw.gov.au

**Woolgoolga to Ballina Pacific Highway Upgrade SSI-4963**

Dear Sir/Madam

I am writing regarding the Woolgoolga to Ballina Pacific Highway Upgrade, in particular, the Woodburn to Ballina Bypass section. However many of my comments are relevant to the entire proposal.

Biodiversity

Overall, I consider the ecological assessments undertaken are exceptionally good. My concern is with the ability of the Roads and Maritime Service to be able to adequately and appropriately mitigate and compensate for known and likely impacts to biodiversity. The main issues of concern are:

- 1) the amount of rare and threatened ecological communities and rare and threatened species and their habitat, will be removed or degraded as a result of the proposed upgrade. I note the proposed mitigation and compensation measures to compensate-offset these losses in the Mitigation and Management Chapter of the EIS. The proposal to seek offsets within 30 km of the impact or if the amount of offset area cannot offsets will be sought up to 100 km of the impact. The large loss of habitat for these species must be offset locally. Compensatory habitat 30-100km may be sufficient for species such as the Grey-headed Flying Fox but is inappropriate and insufficient for local species such as the Wallum Froglet, Koala and Grey-crowned Babbler, that do not move large distances. The conservation of biodiversity requires consideration at the 3 levels – genetic, species and landscape – and the concept of providing habitat 100 km from a population that is losing its habitat in this proposal is ludicrous. For example, the Wallum Froglets, Koalas and Grey-crowned Babblers between Woodburn and Ballina will not move 30-100km away to find the new habitat, supposedly been designed to compensate for their loss. The concept proposed is likely to lead to local extinctions of populations and these extinctions may take 50 years or more to occur. I recommend that the proposed

compensatory habitat plan be conditioned in any approval to ensure that the biology and requirements of each species and habitat are considered. This must include maintenance of local gene pools in a local area, and maintenance of sufficient habitat for these species to carry out their lifecycle in the local area; and compensatory habitat planting must be designed and implemented to ensure that the adaptive potential of local species is not compromised as a result of the plantings.

- 2) The lack of koala underpasses in appropriate areas, particularly around the Broadwater area. I recommend that the approval be conditioned to ensure the records of koalas be further considered and additional underpasses provided at the southern end of Broadwater and at the back of Broadwater.
- 3) The detail of the monitoring proposed needs to be specific for each species and habitat and must not just pay lip service. This requires good baseline data. For example it is not good enough to say we don't know what the home range for the koalas is. There needs to be pre-construction data that allows for impacts to be detected during construction and operation of the Highway to allow measures for corrective action, mitigation, additional compensatory habitat, and adaptive management to be applied.

### Landscaping

The landscaping section is limited in detail to provide comments eg no species list or principles for plant selection were not provided. There are very few of the Pacific Highway Upgrade sections where the landscaping has been appropriately designed and implemented. For example, at the Ballina Bypass the selection of pine trees that will encroach on the access road into Ballina when fully mature is totally inappropriate. The space left grassed has provided ideal habitat for weeds to flourish and the maintenance of these weeds was poor and too late. The approval must include conditions that ensure:

- that species recognised as environmental or agricultural weeds are not planted as part of the landscaping,
- that species proposed for planting that occur naturally in the local area are sourced from local gene pools to prevent genetic pollution and in a way that maximises their adaptive potential in the local area (project section based),
- that native species proposed for planting that occur naturally outside the local area are not likely to cause genetic pollution to related local species,
- that an appropriate maintenance regime for weed control within the landscaped areas is included. This maintenance regime must consider the biology of the species. For example, Scotch Thistles, and many other annual species, sprayed once in bud or flower is too late as the plants biology allows them to finish producing mature seeds before dying.

### Noise

On a still night, from the above address, trucks can be heard entering, driving on, and leaving the existing Wardell Bridge. As the proposed location of the bridge that crosses the Richmond River after Broadwater is around the entrance to the Broadwater which is likely to carry vehicle noise up the Broadwater Channel to the Bagotville Barrage. It must be a condition of approval that the RMS will ensure any landowner adversely affected by noise as a result of the Highway location is appropriately compensated if the problem cannot be rectified through other means.

### Traffic

Many of the local roads are not suitable for additional type of traffic required to use the roads during the construction phase of the project. The local Councils are struggling to maintain roads in a suitable condition and a wheel alignment is required more regularly as a result. If there is increased heavy traffic on these roads then it will cost residents more in tyre replacements, wheel alignments, and delays when travelling. The conditions of approval must include improvement standards that the RMS must keep local roads maintained at.

### Flooding

My father, Jack Matthes has been 40 years in the Broadwater SES. He and his friend, Bert Plenkovich (57 years in the Broadwater SES) have been through all the floods since 1945, including the 1948, 1954, 1974 and 1988-9 floods of the Richmond River. They know what they are talking about and understand more about flood dynamics in the local area than any model generated by the consultants could produce. I request that you take their concerns seriously.

On a personal note, any increase in flooding height and duration is likely to impact on the area around the Bagotville Barrage, in particular, the location of the bridge across the Richmond River just north of the entrance to the Broadwater Channel will act as a partial barrier to the water coming out of the Tuckean Swamp and Broadwater Channel and that trying to move down the river toward Ballina. This will result in a bank up of water. In the 1988-89 floods the water went over the Barrage forming like a tunnel the force was so great, and unless you have seen this sort of thing it is difficult to understand. Therefore I recommend that the approval be conditioned to:

- increase the number and size of culverts and viaducts to allow floodwater to effectively flow away from the towns. This may mean tripling or quadrupling the amount of culverts and viaducts.
- additional measures to enable water to flow where the two bodies of floodwater connect.

The Roads and Maritime Service have said that these impacts are acceptable. I do not consider it acceptable to increase the number of houses that will flood, to increase the height of floodwater in people's houses, or to increase the duration of flooding. With all the

flood issues in the media over the last few years surely it is time to put short term cost saving against medium-longer term costs. All effort must be made at the planning stages to ensure the impacts of flooding are not worse in any way as a result of the Highway Upgrade. Poor planning when we know better is not an acceptable excuse.

Should you require more information I am happy to expand on these comments. I can be contact on [REDACTED]

Yours faithfully

Maria Matthes