

Major Projects Assessments
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

18 February 2013

SUBMISSION:

Woolgoolga to Ballina Pacific Highway Upgrade – Environmental Impact Statement

To whom it may concern,

Please consider this letter, and its attachment, as a submission on the Environmental Impact Statement and associated working papers (EIS) prepared by the NSW Roads and Maritime Services (RMS) for the Pacific Highway Upgrade from Woolgoolga to Ballina.

This letter, and its attachments, have been prepared jointly with our three daughters, [REDACTED] [REDACTED] [REDACTED]

We are long term residents of Wants Lane, Lavadia, and own three properties, two of which will be traversed by the proposed upgrade – Section 3 – if approved. Since moving to our home on Wants Lane in 1984 each member of our family has developed an understanding and knowledge of the natural environment of the area, including Lavadia/Pillar Valley and the surrounding region. In addition, [REDACTED] [REDACTED] [REDACTED] have all obtained Bachelor degrees in the environmental management field and have professional experience working in the areas of environmental health, environmental impact assessment and regulation and environmental offsetting. These qualifications together with our family's first hand knowledge of the region give merit to the attached comments.

It is our view that further efforts need to be made to avoid and mitigate the likely impacts of the proposal, particularly those on threatened species, communities and their habitat. The project area supports an ecologically diverse and rich environment that cannot be replaced or offset. While it is acknowledged that the EIS is a substantial document, supported by what appears to be some good quality field research and analysis we believe that substantial gaps still remain. Given the scale and long-term impacts of the project, we do not believe that the baseline surveys provide enough evidence to predict the likely scale of impacts or provide an appropriate base for ongoing meaningful monitoring programs. In addition, the planning that has been conducted for mitigation and offsetting is

preliminary and is considered by us to be unacceptable if an informed decision on the environmental costs of this project is to be made.

In summary, it is our view that before a decision on this proposal is made, the RMS should be required to invest more time and energy into ensuring:

- a robust set of baseline data for the entire project area (see Attachment A- General Comments on EIS, Baseline Data)
- detailed and auditable commitments to 'best practice' mitigation measures, including detailed management plans (see Attachment A – General Comments, Mitigation and Management)
- detailed and auditable commitments to deliver meaningful offsets prior to any impacts being realised (ie before construction commences) (see Attachment A -General Comments, Offsets)

If the project proceeds, we hope that this is only on the condition that a significant number of improvements are made to ensure that the long term and permanent environmental costs are further minimised and the ecological integrity of the region is not compromised. The current proposal and assessment does not give us confidence that the likely impacts have been accurately predicted or that they can be appropriately managed.

We hope that the comments in this letter, together with the detailed comments attached to this letter, are considered in a meaningful way by both the RMS (and its consultants) and government regulators (NSW Department of Planning and Commonwealth Department of Environment, Sustainability, Environment, Water, Population and Communities).

Yours sincerely,

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Attachments:

A – General comments on EIS

B – Specific comments on EIS