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Major Projects Assessment,
Department of Planning and infrastructure,
GPO Box 39, SYDNEY NSW 2001
plan_comment@planning.nsw.gov.au

Re: Submission on RMS Woolgoolga to Ballina Pacific Highway Upgrade,
Woodburn – Ballina Section

Dear Sir,

I would like to lodge an objection to the proposed Woodburn to Ballina highway upgrade on the following grounds: -

Your project summary of December 2012 on page 3 identifies the following objectives of upgrading the highway: -

1. Reduce road crashes and incidents.
2. Reduce travel times.
3. Reduce freight transport costs.
4. Develop a route that involves the community and considers their interests.
5. Provide a route that supports economic development.
6. Provide best value for money.
7. Achieve a balance between environmental, social and economic impacts and benefits.

For the Woodburn to Ballina section these objectives will not be achieved by the selected route due to the following: -

1. While head on crashes will be reduced this would also have occurred if the current road was widened to 4 lanes and separated by a barrier. Increasing the speed limit to 110 km per hour may well result in larger accidents.
2. Travel times will be increased due to the section being two kilometres longer than the existing route and four kilometres longer than the direct route.
3. Freight costs will be increased due to increased distance.
4. The wishes of the community to widen the existing highway at much less expense were ignored in favour of the RTA predetermined route.
5. This will support economic development for road construction companies but the local economy will suffer as entry and exit points to the new highway will be reduced leading to increased travel times and costs. Increased travel times

- may increase profits for fuel companies but the travelling public will pay and increased transport costs will be passed on to consumers.
6. This is the least value for money when compared to widening the existing route and will take much longer increasing the danger of head on crashes and human and economic losses arising. As the route traverses an area subject to three metres deep flooding it is hard to understand that this will provide the best value for money.
 7. This represents the worst option for the environment with HCV destroyed and koala habitat fragmented. The community will be worse off due to destruction of farmland and houses, noise, vibration, construction and visual impacts and the local economy will suffer due to reduced highway access.

The selection of the route by the RTA and its consultants defies reason. The route selected appears to be a route that was predetermined before any planning was commenced. The route is two kilometres longer than the existing highway and four kilometres longer than the alternate direct route (fig 1). The new tollway will travel through an area prone to inundation by floodwaters of three metres depth. The depth will increase with the damming effect of the new highway and will become worse with the impacts of global warming. Highways are normally rerouted to shorten their length and avoid flood prone areas but in this case the RTA/RMS appears to have defied logic, why?

At Laws Point the route traverses a Pleistocene palaeovalley containing up to eighty metres of soft Holocene acid sulfate clays, mud's and gels. This will make the in stream columns supporting this massive bridge an expensive engineering marvel. The acidity will chemically react with the lime and steel reinforcing in the concrete corroding the concrete and over time weakening the bridge and requiring expensive maintenance.

The route also destroys the best quality natural habitat in the area at Bagotville and will destroy many threatened species including isolating and wiping out the local koala population. The heavy vehicle checking stations and rest areas are located in this area resulting in the destruction of the maximum amount of high conservation value vegetation and ecosystems all for some sort of immediate visual experience for the travelling public. These facilities should be located in areas already cleared which are then planted out to improve their appearance. The expensive poor quality and very limited surveys conducted by the consultants along road verges have been put to shame by the high quality flora and fauna surveys conducted by the community. The consultants and the RTA have unfortunately chosen to completely ignore the detailed community surveys in favour of the inferior consultant's version. In 2005 koala records supplied to consultants were ignored and later claimed to have been received over 3 months later and hence too late in the planning process.

Despite use of expensive consultants and glossy reports the section 10 map does not show Bingle Creek tributaries or planned culverts and Old Bagoville Road has been incorrectly titled Montis road.

The social implications are disastrous for a local community never before impacted by a highway. The highway will bulldoze homes and lives and destroy the tranquillity of the valley with continuous noise and vibration. Pollution from vehicle emissions will

be trapped against the Blackwall Range polluting the air, soil and water. It will be a highway locals will not be able to use due to the distant location of entry and exit ramps and potential toll charges. Locals will therefore be relegated to inferior local roads when travelling across the area and increased travel times.

The RMS like all other government agencies is supposed to adopt the four principles of Ecologically Sustainable Development being (a) the precautionary principle, (b) inter-generational equity, (c) conservation of biological diversity and ecological integrity and (d) improved valuation, pricing and incentive mechanisms (EP&A Regs, 2000). The principles of ESD have not even been considered in the planning process therefore the RMS is in breach of NSW planning regulations and should be prosecuted.

The RMS and its consultants appear to be out of control and unable to make rational decisions. The RMS appears determined to spend the largest amount of public money to achieve the greatest social and environmental damage possible over the longest time frame with contractors and consultants being the only winners. A quick inexpensive upgrade of the present route to four lanes could begin immediately. In places such as north of Wardell this could be achieved by simply repainting the lines. We need a return of common sense to the planning process and if the current decision makers are incapable of this then they need to be replaced.

Yours, Sincerely

Garry Owers



Figure 1: Which route is the most direct and makes any sense?