



Our Ref: 3277899

15 March 2013

The Manager  
Major Projects Assessment  
Department of Planning and Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Dear Sir

## **Woolgoolga to Ballina Pacific Highway Upgrade Environmental Impact Statement**

Thank you for the opportunity to provide comment on the Woolgoolga to Ballina Pacific Highway Upgrade Environmental Impact Statement

Council staff have reviewed the documents and provide the following comment:

### **Biodiversity**

While the Pacific Highway Upgrade proposal intends to remove more than 948 ha of native remnant habitat ( a significant impact 10 times that of the Sapphire to Woolgoolga project) there is no clear indication of how much of that will be from the Coffs Harbour LGA. The EIS includes a break down by vegetation type and several maps showing the location of the proposed route but no stand alone table which shows how much vegetation, and community type, will be removed from the LGA.

Council's position is that any loss of remnant vegetation within its boundaries, including Endangered Ecological Communities, should be offset within the LGA. Clarification of vegetation loss associated with the highway upgrade will assist in determining an appropriate compensation package.

While Council is still to finalise its own fine-scale corridors map, the state government approved 'Key Habitats and Corridors' (Scotts 2003) should be used as a guide for the location of fauna overpasses/underpasses in the Arrawarra/Corindi proposed highway sections. There are two obvious sub-regional corridors which intersect the highway and further planning should be undertaken to incorporate appropriate structures at these locations.

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## Flooding

Council has reviewed Woolgoolga to Ballina, Pacific Highway Upgrade, Environmental Impact Statement, Main Volume 1, Chapter 8 – Hydrology and Flooding; Woolgoolga to Ballina, Pacific Highway Upgrade, Working Paper – Hydrology and Flooding, November 2012, Final.

The above documents look at major waterways for the proposed highway upgrade and assess flooding and possible impacts. Minor waterways were deemed to be those crossed by the project with a catchment less than 4.0km<sup>2</sup> and are not included in the above documents. There is to be detailed assessment of these crossings as part of the project detailed design.

The only major waterway assessed in the Coffs Harbour LGA is the Corindi River catchment that includes tributaries Casson's and Blackadder Creeks. The RMS set various 'Flood Impact Objectives' detailed in the documents. Three of the objectives were: -  
Localised flood increases up to 400mm for small grazing, forest or other rural areas;  
Soffit levels for bridges 300mm above 100 year flood level;  
Flood immunity for 100 year event for project in Corindi catchment.

From the 'working paper' the highway design failed the above objectives and mitigation measures were proposed as follows: -

Station 4.01 – Bridge over Corindi River floodplain revised to reduce impacts upstream to within flood management objectives;

Station 4.7 – Bridge over Casson's Creek raised to meet immunity requirements and debris clearance.

The above mitigation measures are proposed for the detailed design phase to achieve flood management objectives.

Council does have concerns with the methodology and results obtained from the flood assessment.

Flood assessments were carried out for different events being the 2, 20, 100 and 200 year ARI events for the Corindi catchment. No details are provided on what storm duration/s were used for flood assessment. Different storm durations can produce different floods with different characteristics. What durations were modelled and how that duration/s were determined should be provided.

For Climate Change Impacts an increase of 10% in rainfall intensities was used. From flood studies for small coastal catchments such Coffs Creek and Boambee – Newports Creek it was found that Australian Rainfall and Runoff (ARR) underestimated rainfall intensities for design events. For these catchments there was found to be an orographic impact that produced higher rainfall intensities. ARR is currently being reviewed and the methodology for calculating rainfall intensities will change. From discussions with people involved in the ARR review it is likely to include orographic impacts for coastal areas such as the Coffs area. Taking this into consideration plus the possible impact of increased rainfall intensities due to climate change sensitivity modelling of a larger than 10% increase in rainfall intensities, say 20%, is considered warranted.



The assessment undertaken has been for the project (highway upgrade) only. The proposed waterway structures and embankments could change the flood levels and flow paths in the Corindi catchment upstream and downstream of the works. Modelling shows that there is an increase in flood level around the Blackadder Road – Cox's Lane area and houses. These areas were also impacted by the recent works to the existing highway at Blackadder Creek where the highway was raised and additional culverts installed. These works increased flood levels in some area both upstream and downstream. Due to these works having only been recently completed council considers that the cumulative impacts of the highway upgrade and the existing highway works should be assessed and included as part of the project detailed design.

Due to the project design not meeting RMS 'Flood Impact Objectives' and proposed mitigation measures yet to be modelled and assessed Council will need to further review flood assessments when available.

### **Council Assets**

The Pacific Highway upgrade proposal traverses land owned by council that is used for disposal of treated effluent from the Corindi wastewater treatment plant. Council will need to have suitable alternative land made available by the RMS for this purpose. There appears to be surplus land on the northern side of Kangaroo Trail Road that may be suitable.

Eggins Drive is proposed to form part of the service road connection between the Corindi/Red Rock residential areas and the proposed Pacific Highway Sapphire to Woolgoolga Upgrade interchange at Arrawarra. Eggins Drive is to be reconstructed to meet relevant pavement and geometrical design standards for the forecast traffic loadings.

The Corindi/Red Rock residential areas currently have 1 in 100 year flood free access to the Pacific Highway at Tasman Street. In order to meet this current level of service, Eggins Drive will need to be reconstructed to at least the 1 in 100 year flood level.

Any council infrastructure impacted by the works will need to be relocated or protected to Council's satisfaction.

Any new infrastructure, or existing infrastructure proposed to be transferred from RMS to Council control will be subject to a 'handover' negotiation which takes into account any increased asset management liabilities on Council.

### **NSW Coastline Cycleway**

Detail design of the proposed Pacific Highway upgrade should take into consideration recommendations of the NSW Coastline Cycleway Plan. This should include design and assessment of cycle path infrastructure works required on by-passed sections of the Pacific Highway which continue to form part of the Coastline Cycleway.

Shared path connection between the Corindi/Red Rock residential areas and the proposed Pacific Highway Sapphire to Woolgoolga Upgrade shared path must be provided to meet community expectations.

All proposed local road bridge connections over the Pacific Highway should include provision for cyclists and pedestrians unless otherwise agreed to by Council.

### Social/Community Impacts

Council endorses continued liaison and consultation with key community stakeholders in the area regarding localised issues and needs including dialogue with any designated target groups. This should include clear understanding of potential long term noise or construction impacts and measures to mitigate impacts. Council is aware of concerns in regard to adverse effects on 'Berry Exchange' operations. Resolution of any issues relating to this business operation is a high priority.

Consideration should also be given to implementation of strategies to facilitate employment opportunities for people from the local area on the project.

As with the current highway works in other areas of the Coffs Harbour LGA, the proposal could cause increased pressure on availability of affordable rental housing as current stock is occupied by transient workers and has pushed up rental prices. The impact of this may also need to be considered.

The socio-economic data used in the EIS is based on the 2006 census so this could be updated to the 2011 census.

### Heritage

Archaeological Sites of Aboriginal Significance.

(28) Artefact scatters (Appleton and Beck 1995) – The buffer area around these artefacts is shown on page 39 of Coffs Harbour City Council Local Environmental Plan 2000 (LEP 2000).

Non Aboriginal Sites of Heritage Significance.

The following are sites listed in Schedule 5 of LEP 2000 / draft Coffs Harbour City LEP 2013:

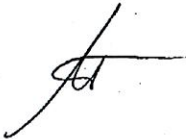
Locality	Item name	Address	Property Description	Significance	Item Number
Corindi	House	30 Blackadder Road	Lot 3 DP826373	Local	134.
Corindi	Homestead	4 Cassons Close	Lot 2 DP793340	Local	135.
Corindi	Homestead	3 Coral Street	Lot 1 DP343983	Local	136.
Corindi	House	70 Cox's Lane	Lot 2 DP815863	Local	137.
Corindi	Homestead	3540-3550 Pacific Highway	Lot 6 DP661510	Local	138.
Corindi Beach	Cemetery	Kangaroo Trail Road	Lot 7011 DP1054533	Local	139.



			DP343983		
Corindi	House	70 Cox's Lane	Lot 2 DP815863	Local	137.
Corindi	Homestead	3540-3550 Pacific Highway	Lot 6 DP661510	Local	138.
Corindi Beach	Cemetery	Kangaroo Trail Road	Lot 7011 DP1054533	Local	139.
Corindi Beach	Residence	68 Pacific Street	Lot 39 DP19794	Local	140.
Upper Corindi	Bridge (pylon remnants and headwall)	Sherwood Creek Road	In creek, adjacent to Lot 135 DP882831	Local	188.
Upper Corindi	Homestead	354 Sherwood Creek Road	Lot 5 DP806208	Local	189.
Upper Corindi	Stockyards	623 Sherwood Creek Road	Lot 1 DP1143561	Local	190.

For further enquiries, please contact George Stulle on (02) 6648 4425.

Yours faithfully



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