



13 December 2013

ATTN: Director, Infrastructure Projects
Development Assessment Systems and Approvals
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

**Submission on Exhibition of Preferred Infrastructure Report
Pacific Highway Upgrade – Woolgoolga to Ballina
Application No. SSI-4963**

In its submission on the EIS for the proposed Pacific Highway Upgrade – Woolgoolga to Ballina, the Clarence Valley Conservation Coalition Inc (CVCC) restricted its comments to the portion of the proposed development passing through the Clarence Valley – the section between Glenugie and the Iluka turnoff.

The CVCC's major concern was with biodiversity impacts – the loss of significant areas of native vegetation and the impact on fauna – particularly on threatened species including the coastal emu. It was also concerned with the proposed mitigation measures, including proposed offsets which the CVCC regards as of extremely questionable value.

The CVCC does not believe that the issues it raised in connection with the preferred route have been properly addressed in the Preferred Infrastructure Report.

If this proposal goes ahead on RMS' preferred route, there is going to be enormous biodiversity loss, loss that will not be mitigated by the RMS mitigation proposals or the provision of offset areas – if any such areas can be found. This loss in our view is unjustifiable, given the fact that RMS could have chosen a route which would have far less impact – the Orange Route.

The PIR claims that the proponent gave appropriate consideration to the principles of Ecologically Sustainable Development:

The project has incorporated these principles, in particular considering biological diversity and ecological integrity in decision making, to the extent possible. The principles of ESD have also been considered in the assessment of the project's benefits and potential adverse effects. Throughout the project, environmental issues have been afforded equal importance along with economic and engineering issues.

The CVCC disputes this. The CVCC believes that economic and engineering issues - and perhaps also political issues - were always the focus of the proponent in determining the preferred route.

The CVCC calls on the Department of Planning and Infrastructure to reject the proponent's preferred route from Glenugie to the Iluka turnoff. The route in this area should be changed to the Orange option for the sake of the coastal emu and the other threatened species.

Leonie Blain
Hon Secretary