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Team Leader – Infrastructure Projects
Social and Other Infrastructure Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

Eden Breakwater Extension – Environmental Impact Statement

Council is pleased to advise that issues raised previously by Council in comments to the draft and final REF's have been comprehensively addressed in the exhibited Environmental Impact Statement for the Eden Breakwater Wharf extension. We wish to restate the key importance of a range of subsequent plans and documents such as CEMP's as mitigation measures listed in the EIS. It is essential that the responsibilities for oversight and auditing of these plans and measures are clearly identified by way of nominated position / agency in the final Development Approval Conditions.

One issue that has emerged during the review of the EIS is the proposed transport route through Eden which is not supported by Council and this is addressed later in this submission.

Further the impact of the proposal on whale migration and behaviour is still of concern and Council acknowledges that this impact is dependent on the final timing of piling and dredging works. Further the impact on marine mammals may not truly be known until works begin and the range of comprehensive mitigation measures are tested. We would suggest that there are distinct windows of opportunities for the dredging and disposal (and related ship movement) activities in particular to occur outside of the bi-annual whale migrations and approvals should be expedited to allow works to begin as soon as possible in order to provide flexibility in the timing of works.

Please see Council's comments below and conditions that Council suggests be included in the final approval of the project;

- **Dredging / Spoil disposal**

- That options for dredge to barge transfer of sediments be considered as part of Dredging ***Option 3 Partial Double Handling Method***, to reduce turbidity and sediment plumes associated with the dumping of dredged material within the dredging footprint.
- That Cocora and Cattle Bay Beaches be monitored during dredging works and should sediment plumes impact nearshore waters, advisory signage be placed on beaches providing temporary closures. Placement of signage will be responsibility of contractors.

- Following completion of the project that consideration be given to the shallow dredging of sediments adjoining Cocora and Cattle Bay Beaches to remove any sediments that may have accumulated during dredging and disposal works.
- **Noise**
 - That a Construction Noise and Vibration Management Plan be developed as recommended by the EIS.
 - That affected acoustic receiver's as identified within the EIS be included in a project communications contact list (email / newsletter), to provide regular updates on the timing and extent of major noise generation works.
- **Marine algae / sensitive marine environments**
 - That marker buoys be deployed to mark no go areas with regard identified sensitive marine environments within the Cattle Bay / Snug Cove precinct.
- **Servicing**
 - That the project manager meet with Bega Valley Shire Council's Manager of Water and Waste Water, as soon as practical to determine requirements for accessing Council's reticulated water supply network and post construction impacts on capacity of Snug Cove infrastructure to handle increased waste loads on public or private toilet facilities as part of cruise ship visitation.
- **Monitoring and Auditing of Construction Management Plans**
 - For each proposed CMP or environmental monitoring program listed as mitigation measure in the EIS, that a specific State Agency or Officer be nominated for the responsibility of auditing each mitigation measure.
- **Council does not support the use of the nominated route of Imlay Street between Mitchell Street roundabout and Albert Terrace for the following reasons:**
 - The impacts on public safety and amenity to pedestrians, vehicles, residents and business owners through the CBD of Eden from the increase in numbers of heavy vehicles during the 59 week construction period. The Eden Public School is also situated on Imlay Street between Mitchell Street and Bass Street and the increase in heavy vehicle traffic particularly during mobilisation/de-mobilisation and concrete pours increases risks to local students, parents and school bus movements. The CBD is an area of high pedestrian and light vehicle movement activity. The increase in and sustained volume of heavy vehicles associated with construction activities, is incompatible with the activities and traffic conditions within the CBD precinct.
 - The impacts on Council road infrastructure particularly for the newly constructed \$1.3m CBD Streetscape and pavement along Imlay Street between Bass Street and Chandos Street. The estimated number of heavy vehicles ranging from 6.4m light rigid through to 19m semi and truck and dog combinations was not allowed for during the original pavement design completed some 2 years ago. The increase in heavy vehicles and

equivalent standard axle loadings is anticipated to significantly shorten the 20 year design life of the road pavement and damage the asphalt surfacing and underlying lightly bound pavement. It could be anticipated that pavement rutting, deformation and cracking is likely to occur from such a sustained period of heavy vehicle activity. It is estimated over the proposed 59 week construction schedule that an estimated 2,500-3,500 additional heavy vehicles are likely over normal conditions. Further, as part of the CBD Streetscape beautification of Imlay Street between Bass and Chandos Street, kerb blisters and kerbside landscaping features have been installed that now change the horizontal geometry for swept path movements that may be incompatible with larger heavy vehicles. It could be anticipated that damage to kerb blisters or kerbside landscaping features may be sustained during turning movements.

- **Council proposes the following alternative access options with conditions:**

For Heavy Rigid, 19m semi, 19m truck and dog combinations

- Mitchell Street between Princes Hwy roundabout and Calle Calle Street
- Calle Calle Street between Mitchell and Chandos Street
- Chandos Street between Calle Calle Street and Imlay Street
- Imlay Street between Chandos Street and Albert Terrace

For Medium Rigid and Light Rigid

- Mitchell Street between Princes Hwy roundabout and Calle Calle Street
- Calle Calle Street between Mitchell and Museum Street
- Museum Street between Calle Calle Street and Albert Terrace

As per the original proposed route for Light rigid, medium rigid, heavy rigid, 19m semi and 19m truck and dog combinations:

- Albert Terrace between Imlay Street and Weecon Street

Whilst on Council local roads the following conditions apply:

- Any oversize/overmass or Performance Based Standards permits required during the period of construction shall be submitted to the National Heavy Vehicle Regulator (NHVR) for approval
- Where any part of the vehicle, including its load or any equipment, exceeds 4.9m in height, approval must be obtained in writing from the following third parties before travel commences:

- 1) *Essential Energy*

This approval must be obtained and complied with in addition to any other clearance requirements in force along the route.

- For any over-dimension loads, all residential properties along the route are to be notified of the planned vehicle movements at least 3 working days before commencement.

- Vehicles must remain on the sealed section of carriageway for the entirety of its journey when practical.
- Trucks must enter and leave the Snug Cove site in a forward direction only.
- Exhaust brakes should not be used in built up areas.
- For any over-dimension loads, (Two) <2> additional Pilot vehicles to accompany the permit vehicle from the Mitchell Street/Princes Hwy Roundabout to the construction site at Snug Cove.
- For all heavy vehicles, travel is only permitted during daylight hours
- For all construction traffic, travel is only permitted between the hours of:
7 am – 6 pm Mon – Fri
8 am – 1 pm Saturdays
No travel on Sundays and public holidays.

Finally Council's Access Advisory Committee has requested that any design has regard to access for persons with a disability to and from any berthed ship.

Should you wish to discuss this matter further please do not hesitate to contact me on 0428962974 or via email ktull@begavalley.nsw.gov.au

Regards



Keith Tull
Manager Planning Services

