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Director – Transport Assessments Department of Planning GPO Box 39 Sydney 2001

## Submission - Coffs Harbour Bypass EIS - SSI 7666

Thank you for the opportunity to comment on the Coffs Harbour Bypass EIS. Generally we are pleased common sense has prevailed and we make the following comments on the EIS and the process ahead:

## Overall

1. Coffs Harbour City's geographical setting occurs uniquely at a point where the Great Dividing Range meets the sea. The surrounding environment includes iconic vistas and places of important cultural and environmental heritage. The proposed bypass route traverses directly through this environment so the design ought to preserve it intact to the greatest extent possible. Visitors are drawn to Coffs Harbour by its unique setting. Tourism and visitation are a critical component of the Coffs Coast economy. They are heavily dependent on the attractiveness of Coffs Harbour's unique setting. Earlier bypass designs produced by the RMS would have seriously harmed this setting, its iconic beauty and cultural significance. We did not support these, so it is a relief to read that, at last, the updated design includes three tunnels, a lower gradeline, and a quiet asphalt surface.

#### **Noise and Traffic**

- 2. Affected residents' concerns that many of the noise measurements in the RMS study seem very different from their actual noise experience should be evaluated. This affects how RMS determined what houses should, or should not, be treated. The basis and outcomes for these should be reviewed.
- 3. Some traffic counts appear misleading. Night-time readings for houses away from the existing Pacific Highway appear overstated giving the appearance of a lot of night-time noise on local roads. Elevated noise readings can exclude some of these houses from noise treatment. These should be reviewed.
- 4. RMS seems to be treating some estates and not others for noise relying on historical DA conditions for individual estates that could not have been cognisant of potential major interchanges being constructed in the vicinity. House designs to block out road noise near a local arterial road with relatively lower traffic speeds and night traffic volumes would be vastly different to those designed for highway noise at 110kph and significant heavy truck volumes at night. This should be reviewed.

- 5. Construction noise levels seem very high without proposed treatment of houses for that noise which may go on for years. This should be reviewed and appropriate treatment be provided for.
- 6. The Roselands Estate seems to be ignored. It will be one of the most affected housing estates along the bypass route. It should be a condition of consent that Roselands Estate properties receive similar post construction noise treatments.

## **Dangerous Goods**

7. The EIS statement that a dangerous goods risk assessment has been done contradicts the RMS information update accompanying the EIS stating that the issue of dangerous goods had not yet been resolved. The bypass is supposed to remove all heavy vehicles from the existing Pacific Highway at Coffs Harbour which will then become a local road. How could the EIS not deal fully with dangerous goods, particularly in such a dense city location? A dangerous goods risk assessment must have been completed for RMS to make any sort of decision about this and it should have been published with the EIS documents. The same arrangements applying to the Ewingsdale tunnel should be applied to the Coffs Harbour bypass tunnels.

## Consultation

8. This is a vast project that will take years to complete. At times it has been characterised by inadequate consultation. For years RMS asked us what the community wanted. Tunnels were eventually agreed. Then, without any further consultation, RMS published a completely different design with no tunnels - an approach that was resoundingly rejected by the community. The public exhibition of such a voluminous EIS with only six weeks to comment, two of which were school holidays, requires public consideration to be unduly rushed, calling the exhibition process itself into question. The display booths RMS set up are remote from where the directly affected residents reside. Considering the scale of the potential impacts, RMS should also have met with and explained how these are to be treated to locals in the affected estates.

This is yet another 'concept' design. Given the tendency for important past design changes to be at odds with community opinion, there should be opportunity for more consultation when the final detailed design is complete to ensure any subsequent modifications to it still reflect community expectations. Also, the community should be given assurance that any eventual design and construct contract for the project will align with the design arrangements on which this EIS is based.

#### **Biodiversity**

9. The Coffs Harbour Bypass route is unique along the eastern seaboard because this is where the Great Dividing Range meets the Coast. This is why flora and fauna abound and make Coffs Harbour a biodiversity hotspot. Consent conditions should

ensure that when the bypass is being constructed only local native species are planted during revegetation activities to ensure the least disturbance to our flora and fauna.

We declare that we have not and do not make political donations.

Kind Regards

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