Coffs Harbour Greens
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Director – Transport Assessments
Department of Planning
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COFFS HARBOUR HIGHWAY BYPASS EIS SUBMISSION (SS1_7666)

Thank you for the opportunity to make comment regarding the Coffs Harbour Bypass EIS.

While we have several concerns regarding RMS's Coffs Harbour Highway Bypass Environmental Impact Statement September 2019, we ultimately support calls for this project to be a **'construct only'** when tenders are contracted.

We understand the social and economic need for the bypass but feel its environmental footprint will impact biodiversity and conservation values.

Tunnels

The inclusion of 3 fully bored tunnels as part of the EIS are to be commended. We believe this series of tunnels is a long term investment in valuing the environment and reducing noise impacts associated with the roads vertical alignment.

However, we are concerned that the EIS does not clarify if all Dangerous Goods can use the bypass but instead will be forced to use the existing Pacific Highway. We understand the tunnel at Ewingsdale near Byron allows all classes except Class 1 and Class 2.1 class of dangerous goods. So will the Coffs Harbour bypass accept all classes of dangerous goods or not?

A risk assessment must have been completed for dangerous goods travelling via the bypass or sending dangerous goods through Coffs harbour. We must have confidence that these tunnels will be built to a standard set by the precedent at Ewingsdale that can manage all classes of dangerous goods outside 1 and 2.1.

Noise

We are concerned that houses in West Coffs adjacent to within 600 meters of the bypass will have peak noise readings at night much higher than when averaged out. The EIS already states some elevated night time readings, which is concerning. Will the RMS mitigate houses according to peak noise readings?

This leads us to question the methodology used to gauge the noise affecting housing estates. We have come to understand that not all estates have been assessed equally and raises a concern about the assumptions made of the noise from traffic.

So, are the noise assumptions genuinely in alignment with what resident's experience?

We are deeply concerned that noise mitigation has been applied ad hoc to individual homes and not comprehensive of the full needs of affected homes. We remind the RMS of the historical impacts associated with highway upgrades on residents on the northern beaches of Coffs Harbour. Resident health was sidelined for construction efficiencies.

West Coffs Harbour residents will benefit from having the vertical alignment of the lower road and tunnel network, however, noise mitigation needs to be a responsibility of the RMS and not Coffs Harbour Council. The DA process is not a reason to claim positive publicity for the management of the noise mitigation standards for new developments.

It concerns us that the RMS have not planned to treat houses for noise associated with the construction phase of the bypass. We see in the EIS that noise levels will be elevated and may go on for years. Noise mitigation must be a priority prior to the construction phase.

Traffic

We would like to see the bypass include 'public depots/hubs' that make use of spaces for bus lanes and car pooling. The EIS does not seem to make provisions for these increasingly important uses of public space. Public transport must be seriously considered in order to reduce carbon emissions.

Biodiversity

We are concerned that the environmental footprint of the development will have significant impacts on vegetation corridors and biodiversity values outside the inclusion of tunnels.

The escarpment corridors down to the coastal region are a vital network of vegetation that allow a range of fauna to migrate. The bypass footprint, as it stands, will interfere with the current behaviours of many species as they naturally move through vegetation.

Where in the EIS were night fauna surveys to assess the types of animals impacted by the bypass?

Impacts on local koala populations is of high concern to many in our community. There are people who live near Newports creek and are concerned that the bypass will cause stress to local koala populations and loss of habitat. This can not be underestimated as koala populations are in serious decline according to the Office of Environment and Heritage Areas of Regional Koala Significance. Making provisions that safeguard koala habitat must be a priority all along the 14km's of bypass.

We would like to see fauna passageways identically matched to the current fauna passageways and call on the RMS to commit to a high number of fauna management and mitigation measures, with particular focus on the local koala population, including the establishment of 100's of hectares of new koala food trees.

Also, all vegetation plantings along the bypass must be native and locally sourced. The planting of flowering feed plants must be avoided to decrease mortality of native bird and bat species.

Coffs Harbour is one of the most scenic coastal regions in Australia and we request that the best environmental outcomes are made possible in the final design. We are again grateful that tunnels have been included in the EIS, however, we request that a portion of the earth mounds be replaced with clear perspex at key sights so visitors to our region can enjoy prime views across the city of Coffs Harbour.

Bypass Lighting

We call on the RMS to implement an intelligent motion sensor street lighting control system that automatically activates when a car is noticed in the area. If there is no activity in the area, the light is automatically adjusted to an optimized minimum light level. Will you please consider this smart sensor technology to reduce night-time fauna disturbance?

Thank you again for the opportunity to comment on the Coffs Harbour Bypass and we reinforce our preference to see the final design be completed by the RMS and a construct only plan be contracted.

Yours sincerely

Jonathan Cassell
Coffs Harbour Greens Convener