

23rd October, 2019.

Attention: Director – Transport Assessments
Planning and Assessment
Department of Planning Industry and Environment
GPO Box 39
Sydney NSW 2001

*Please delete my personal information before publication.

Dear Sir/Madam

REF:- SUBMISSION FOR COFFS HARBOUR BYPASS – SSI _7666

I am writing a submission, in response to the current EIS Concept Plan SS1_7666 presented September, 2019.

I moved to Coffs Harbour 4 years ago. The area in which I live is 98% of the time, very peaceful and quiet. The exception are the trains that travel through the hills between Roberts Hill and Gateleys Road. This area is a huge amphitheatre, thru which noise is greatly amplified, especially at night. Particular emphasis on noise and pollution mitigation will need to be made a priority. The trains are intermittent, unlike traffic, which will be constant, along the proposed ring road. One cannot seriously call this a bypass. I dread the noise and vibrations that we are going to endure 24 hours of the day. I don't know which is scarier, the fact that the 'powers that be' call this a bypass, or the lack of insight and intelligence that they feel they can fool the community into thinking that this is a bypass and a great deal!!!!

If one looks at the bypass at Port Macquarie and the St Helena Tunnel, this proposed ring road is definitely not a bypass. At the moment, the heavy trucks go along the Pacific Highway at the east end of Bray Street. This ring road proposal has the heavy trucks and constant traffic no more than a kilometre from the west end of Bray Street. Hardly a bypass!!!! Especially as the population is growing steadily in and around Coffs Harbour.

The original plan of the far Western Coastal Bypass, which was considered in 2000-2004, and is what the community thought they were getting, needs to be put back on the table. This would benefit West Coffs plus Korora, Sapphire and other residents effected by this unwanted ring road. It would also be of great benefit to the natural environment for the flora and fauna, and to the general community of Coffs Harbour. It would also be more respectful of our local Aboriginal heritage. The CRW proposal would also cause minimal property remediation and environmental impacts on the entire community.

The Coastal Ridge Way proposal re: (2004 Connell Wagner) proposed the Bypass from the southern end of England's Road, through Ulidarra National Park and Bucca Valley to existing Halfway Creek Upgrade. Tunnels were also proposed in this concept design. I have noted that the Government and RMS have decided this is too expensive! They prefer the cheap ring road. My concern is that this ring road is a very short-term concept. Within 2 to 5 years, both the ring road and Pacific Highway will be unsuitable for the volume of traffic. This is due to the ongoing growth of the population, with regional centres expanding due to the high cost of living in the main eastern city centres. The Coastal Ridge Way concept is a longer-term design as there is space on either side of the highway to widen roads necessary in the future, without remediation of numerous properties.

In addition to the potential benefit of the CRW proposal and the tunnels, it is expected that the longer-term detailed planning of the by CRW bypass proposal would see community demands for an environmentally sensitive and less intrusive highway alignment, especially given the highly urbanised settings within Coffs Harbour.

The placement of the ring road, which has been incorrectly called a bypass, will impact significantly on this beautiful City.

I attended the RMS Office to look at the layout of the Concept Design at the Park Avenue Office. I was given ear phones to get an idea of the noise that would affect my local area. 40 decibels was the 'projected' noise volume. Well, myself, my neighbours and many more properties along the amphitheatre from Roberts Hill to Gateleys Road would dispute this. The ring road is going to run parallel to the train line. I would suggest the RMS is not being transparent at all.

The ring road is going to run parallel to the train line. The noise is far from the projected 40 decibels, of which I was advised when I visited the Park Avenue Project Display.

The health effects of noise and pollution are well documented in science. I am unsure if the owners of the properties, which the RMS have deemed applicable for noise reduction strategies, are aware that they will no longer be able to open their windows and doors to get fresh air. I cannot even begin to imagine the impact on health the noise and pollution is going to be. Not just for the people and properties in the areas, but for the flora and fauna.

The Coramba Road Interchange planned is disastrous on so many levels. Multiple properties will be affected, not to mention the significant environmental impacts. This is a huge mistake in the planning of the project. 'Unfathomable' is another way of expressing this plan.

Despite strong community and council support for a Western Bypass (CRW), the RMS and government have continued to pursue the Inner Coastal Route (effectively a high-speed ring road) running through the west of Coffs Harbour. For example, numerous demonstrations, submissions, survey results, etc. have occurred and been largely ignored.

The RMS and Government have dismissed the major socio-economic impacts to Coffs Harbour and its residents that will have far reaching implications from a development and growth standpoint. This is despite the recognised and increasingly important role of Coffs Harbour as a fast-growing regional hub and highly desirable location for 'sea changers', retirees and families as a lifestyle choice.

The RMS and Government have continued to misrepresent the proposed Inner Coastal Route as a Coffs Harbour bypass when in fact it traverses the west of Coffs Harbour and does not support the premise of a bypass misleading many in the community.

The RMS and Government has continuously presented information on the route in a sanitised and skewed manner effectively obfuscating representations of how the Inner Coastal Route will impact Coffs Harbour from a visual and environmental standpoint.

Insofar as the 'Concept Design' label is concerned, this offers no sense of certainty as to what will be delivered.

Alternative options for a highway upgrade location were dismissed with minimal information provided to the community apart from in some cases costings which did not map to any detail.

Interchanges are not workable given tight turning circles and insufficient information as to how they will integrate into existing roads (particularly Coramba Road), bike routes, etc.

Staging methods and route have not been provided including machinery access and transportation of equipment, personnel and construction supplies.

Mitigations to address environmental destruction and disturbance are not provided and those that are will not be reasonably effective.

Mitigations to address socio-economic impacts including noise, pollution and visual disturbances are not clearly outlined nor are they complete.

Progress of the project does not follow a logical methodology. For example, land is being acquired despite incomplete resolution of the proposed route, impacts and mitigations. The immediate community is in a state of limbo and anxiety and is being held to ransom by the RMS through confidentiality agreements and secretive heavy-handed negotiations leading to deep divisions, hostility and contention in the community.

Also, in reference to requisition of land, the RMS has acquired land, which is currently used for farming, at the junction of Vera Drive, and Mackays Road, on the opposite side of the train line. An RMS Depot is planned to be built there. The depot is likely to be used as a construction and storage depot. This basically means that Mackays Road, Vera Drive, Don Patterson Drive and Bray Street, amongst other streets in this area, will become throughways for trucks, utes, and construction machinery. I would also query whether this area is going to be used as an area for stockpile. (please see Coffs Coast Advocate Wed Oct 23rd 2019, to see the results on homes from the vibration of machinery etc). Absolutely devastating for homes in the area, and as shown by people effected by the Pacific Hwy-Urunga Bypass, the RMS and Government are not going to take responsibility for compensation required to rectify the damage to properties. The impact of this on the local community, regarding noise, pollution, vibrations of traffic and machinery, and the impact of local traffic will be catastrophic. Once again, I am flabbergasted at the lack of insight the RMS and Government has for this entire project.

The close proximity to residential areas requires clearly outlined mitigations to minimise disruption to road access including public transport and bicycle paths enabling residents to move around with safety and reasonable convenience, particularly given the multi-year works anticipated. This information has not been provisioned.

In further reference to **noise and vibration**, the close proximity to residential areas and steep hill gradients poses a significant risk of landslides and damage to hundreds and possibly thousands of properties with associated safety issues. Noise and vibration are issues both during highway construction and when operational. However, the RMS has indicated that minimal mitigating controls will be implemented during the highway construction period. The valley location of the Inner Coastal Route will act as an amphitheatre and the RMS has acknowledged that there is no mitigation solution for adequately controlling traffic and construction noise apart from remediation of individual properties. The RMS has drastically minimised the number of houses effected. Roselands Estate not even rating a mention, and the ring road goes very close to all of the houses in and around this estate.

Remediation comes in the form of double glazing and air conditioning, which ultimately diminishes the quality of life for residents who can no longer enjoy the amenity of the sub-tropical climate and the outdoors. The running of air conditioning is at the resident's cost, which over time can expose them to financial stress. This is in terms of power bills and unit repair/replacement/update given the

lifespan when operating 24x7 during warmer seasons in particular would not be expected to last beyond 5 years.

The population in Coffs Harbour has progressively moved west so many thousands of properties would be impacted by noise and vibration but the RMS has not quantified this total. Additionally, the RMS has indicated that the council should not have approved western developments. So it is unclear whether properties built subsequent to 2004 will be considered by the RMS from a mitigation standpoint.

Traffic noise will be considerably louder in the west than on the existing highway through Coffs Harbour given the speed limit will be 110kms instead of 60 kms per hour. Trucks will labour up gradients of 4-6% increasing engine noise and then downhill noisy airbrakes will be invoked. A significant proportion of long-haul trucks alongside other motor vehicles have installed non-standard and non-compliant exhaust systems which are typically not legal and are not being policed in the region, causing a major and unnecessary disturbance to residents.

In reference to **Biodiversity**, highly significant and unique remnant bushland and koala habitat rated at the highest level of environmental protections will be destroyed or located in close proximity to high-speed traffic with no indication of any mitigating measures. Remnant bushlands are located along MacKays Road and Bruxner Park Road.

Proposed wildlife crossing corridors cannot link back into remnant bushland given it will be destroyed therefore such mitigations will be rendered ineffective.

Mutton bird migration is at risk with young birds potentially disorientated by head lights shining throughout the night high up on the ridgeline. I live near a Koala Corridor, and I have serious concerns for their habitat, and also the other fauna in this beautiful pristine valley. The Koalas are already on the 'endangered species' list. The area from Roberts Hill to Gateleys Road is a Koala Corridor. The impact of this current concept plan of the ring road is going to be catastrophic to their habitat.

In reference to **Cultural Heritage**, highly significant indigenous heritage landmarks across the ridge will be destroyed in the event of open cuts for the highway which the RMS appears to have proposed without consultation with local indigenous communities.

The Coffs Harbour community has invested a great deal of time and commitment into reconciliation to remedy historical failings of European intervention in this area. and now enjoys a well engaged, valued and respectful relationship between the indigenous and non-indigenous communities. It is inconceivable that this significant progress and cohesive relationship should be threatened by the thoughtless and insensitive construction of a highway through lands that are embedded in indigenous folklore and song lines.

In reference to **Air Quality**, much of the highway location traverses a valley or basin, heavy diesel particulates, many pollutants, dust, etc. are heavier than air and in the absence of wind will fall onto the surrounding properties, farms and water ways. It is not uncommon, particularly at night with the inversion layer that cloud, fog and smoke suspend in the air and form a blanket across the valley. No amount of mitigations can change this, meaning that pollution levels will increase and settle in the area. This will significantly effect the health and wellbeing of residents, flora and fauna, and the desirability of living in the west of Coffs Harbour.

Residents located along the existing Pacific Highway route in Coffs Harbour experience unacceptable levels of pollution from passing traffic. Trucks are of particular concern such that opening windows, enjoying the outdoors and even washing clothes becomes hazardous. Relocating the highway to the west of Coffs Harbour will transpose the air pollutants to populated residential areas within a valley that does not benefit as greatly from coastal winds to displace pollution. It is therefore reasonable to assert that the pollution will be even worse in the west of Coffs Harbour.

A hospital, respite centre, retirement village, preschools and college are all located within the valley location that will be overshadowed by the Inner Coastal Route exposing frail, weak, ill and children to pollution and health issues that otherwise does not exist in the existing suburban and rural settings. People who are vulnerable to pollutants who reside in west Coffs Harbour to enjoy the healthy lifestyle may be in fact forced to move to preserve their health and wellbeing.

In reference to **Socio-economic, Land Use and Property**, the scale of socio-economic impacts has not been quantified but is reasonably anticipated to negatively affect 1000s of properties and many more residents. There is no justification as to how the socio-economic cost is measured against the project benefits.

Many residents located towards the east of Coffs and in the vicinity of the existing highway experience major negative impacts from the current highway. This serves as a prelude to conditions that will be moved across to the west of Coffs Harbour.

The proposed Inner Coastal Route does not mitigate an unacceptable highway situation but rather relocates it to another area of Coffs Harbour in the west. Thus not resolving a serious problem in Coffs Harbour. In fact, this will introduce another busy road into the city given much of the day-time traffic is local, making traffic noise and pollution ubiquitous to the whole town.

The community has become deeply divided by RMS's drawn out process and general disregard for their concerns, regarding the proposition presented by the RMS and government of this Inner coastal Route otherwise identified as a ring road.

Many farms in Coffs Harbour are long established and are on relatively small land allocations that will cease to be viable in the event of highway encroachment resulting in loss of livelihoods. The uniqueness of the Coffs Harbour region, the sheltered valleys and respective specialised farming techniques with the benefit of the close proximity to infrastructure does not exist anywhere else beyond the Inner Coastal Route path or otherwise established farms in the region. There are no opportunities with commensurate conditions for displaced farmers to pursue their livelihoods in alternative locations in this region, given the demand for residential developments on available land. This will force the farmers to either relocate far afield or start a new career.

Many farms have existed within the same family for generations and older farmers, in particular, will experience significant disadvantage and psychological hardship. They may not be in a position to restart their lives in a new location and industry. Many farmers lives are tied to their work which cannot be mollified by financial compensation for their loss.

Farming is a valuable economic contributor and is in fact iconic in the region celebrated by the landmark Big Banana complex. The Inner Coastal Route is detrimental to the success of farming in the region. Apart from reducing the availability of viable farm land, pollution in the form of diesel particulates and other pollutants associated with highways, as well as risk of damage to the water table during construction and ongoing road vibration, may undermine the value, reputation and productivity of Coffs Harbour farms and their produce.

The rural amenity enjoyed in the west of Coffs Harbour that serves to make this a desirable place to live and that attracts real estate value and development will be compromised irrevocably under the shadow of a high-speed motorway. The potential for optimised property values in what is currently prime real estate in a growth corridor with mountain and ocean views will be diminished significantly and permanently. Many residents in the west of Coffs Harbour have moved from urban city areas to enjoy the amenity and lifestyle that is now under threat.

As concerns are raised about the impacts of the highway, concerned residents in west Coffs Harbour are increasingly preparing to list their homes for sale with property values either not growing or dropping as fears mount. Real estate agents, conveyancers and the council are not forthcoming in terms of buyer awareness of the Inner Coastal Route and potential impacts to surrounding residents. Property buyers from further afield who are not being adequately served by duty of care from the property industry and council are particularly vulnerable in their property acquisitions. Many established residents are not familiar with the Coastal Inner Route location so outsiders are particularly disadvantaged.

In regards to **'construct only'** the advantages of this term means there is minimal risk to the contractor whose role is to construct in line with the design completed by the principal, architects and engineers. Advantages are that the design cannot be greatly modified during the building process, unless defects of design are noted. **In this option, if tunnels are planned, its tunnels the community gets.**

The primary risk **'re Design and Construct'** contracts mean that the principal has minimal input during the construction. Often referred as 'package deal' contracts. Whereby the principal has minimal input throughout the entire process, and when construction is complete turns up to use the works for intended purpose.

Also, because of the higher risks for the contractor, as is responsible for design and construct, not just construct, they require **higher costs to compensate**. The contractor assumes the time and cost risks associated with modifying a design which may be impractical or employing a different method of working which becomes necessary to achieve completion.

In relation to the current WestConnex project in Sydney, there have been some unexpected 'modifications' for the final stage of the project, which has left the community outraged. Instead of an underpass at Rozelle, they are getting an overpass! The contract is a 'design and construct' contract.

If the Community, the Coffs City Council, and the Coffs Bypass Action Group do not demand a 'Construct only' Contract, at any time throughout the project, those tunnels that the Community, the Council, and Coffs Bypass Action Group fought so hard for, could become cuttings. Which is what the Government and RMS want – the cheap option. **'Design and Construct' should not be an option.**

(It would be advantageous for people in the community to see on the Facebook 'RTA-RMS bypass upgrade victims', especially in relation to the Ballina and Toowoomba bypasses to see the effects of changes made, of which the community were misinformed).

The current plan of the ring road is unworkable in real life and is detrimental to humans, flora and fauna for an eternity. The Coastal Inner Route will redefine the boundaries of Coffs Harbour,

constraining development and growth into the future and compromising highly desirable prime real estate. This prime real estate will either become part of the motorway or so impacted by its proximity that it will be diminished in value and appeal.

Throughout this long battle with the RMS and Government in fighting for what is best for the community, I don't have much trust in the RMS or government. Transparency is not something they seem to be familiar with. I fully support the Coastal Ridge Way Bypass with tunnels, and I do not support this Inner Coastal Ring Road. I would also like to add that I support the 'Construct only' option, so as the community voices will keep being heard throughout the entire project.

Yours faithfully