

27/10/2019

To Whom it may concern,

Submission to the RMS: Coffs Harbour bypass Environmental Impact Statement, September 2019

I would like to start this submission by making the point that I am a busy person and that the time taken to write this has come at the expense of both paid work and leisure. But I suspect it will land in the same black hole with all my other communications to the RMS, local, state and federal government which if it is read then ignored and dismissed but probably just filed away to tick the community engagement and feedback box. Despite this, I still desperately hope that there is someone within the bureaucracy who has a conscience and a thinking brain and realises that this highway upgrade location will be catastrophic for Coffs Harbour – regardless of tunnels. And so I feel compelled to write this submission outlining some of the many issues that will be faced if the highway upgrade goes ahead in the proposed location through the west of Coffs Harbour.

The fundamental premise made by the EIS, the raft of RMS communications and the SEARS beforehand is false and deeply compromised and in effect renders the EIS invalid. The premise being that the proposed Pacific Highway upgrade is a Coffs Harbour bypass when it would in fact be a ringroad that traverses the outer western suburbs of Coffs Harbour requiring the displacement, acquisition and remediation of 100s of properties, 1000s of people and affecting 1000s more. Not insignificant given that this is a regional area and not a big city.

The RMS, local, state and federal government representatives and ministers have been made aware of this misrepresentation on numerous occasions since the RMS/RTA proposed the current route in 2004. They have however all vexatiously chosen to ignore this fact which is material to the understanding and future of the residents of Coffs Harbour.

The RMS/RTA has published 1000s of pages of information, at times inconsistent, contradictory and omitting important detail, about the proposed Pacific Highway upgrade over the past 19 years or so and it typically falls into 2 categories. That which is detailed and typically not consumable by the 'average' person and the other glossy spin. Neither of these are helpful in providing the right level of information and accuracy to the community. And then given that most people in Coffs Harbour have assumed the correct use of the term bypass and applied this at face value, they have not been incentivised to explore the actual detail of the proposed route, it's affects and that they are being lied to. Furthermore, based on this general assumption, there is a broad perception that dissenting residents are noisy, self-indulgent whingers leading to division and malice in our community making it particularly difficult to conduct fact-based public discourse. The previous state and federal government representatives, Andrew Fraser, Luke Hartsuyker and Melinda Pavey actively stoked this division and misconception further exacerbating community discord.

The EIS falls into the lengthy and complex category comprising of a set of documents (18 documents with around 5000 pages) that most 'average' people neither have the time nor capacity to adequately review and comprehend, and to think otherwise is delusional. Therefore, realistically it will not serve as a useful decision making and informative reference. The accompanying glossy spin in the form of the September 2019 Project Update brochure, the interactive portal and community consultation display in Park Avenue act as little more than PR exercises presenting a cynical smoke and mirrors deception to the residents of Coffs Harbour.

Taking this context into account, I submit this document and expand on the following key points in objection to the proposed Pacific Highway route and the EIS:

1. **Bypass versus ringroad:** Through persistent and vexatious misuse of the term Coffs Harbour bypass, Government and RMS communications have fundamentally misrepresented the outcome of this project which would deliver a ringroad rather than bypass thus misleading the community and disengaging them from pursuing an informed discussion.
2. **Amenity:** Within 500 metres of the construction zone, there are well-established urban areas that were planned and constructed without consideration for the imposition of a high-speed motorway in close proximity. The impacts to these areas in particular in terms of the quality of life for residents, environment health, viability of farms, businesses and other enterprises including schools and childcare, the Baringa hospital, respite care and nursing homes will be catastrophically and permanently diminished and possibly destroyed due to noise and pollution. Proposed remediation of properties will not mitigate the impacts of a high-speed motorway within close proximity and restore quality of life. The west of Coffs was developed to be a green, urban area with rural features and a high-speed motorway cannot sympathetically be retrofitted and as such will catastrophically disfigure and disrupt an harmonious and ambient place to live.
3. **Real estate:** Coffs Harbour comprises two key zones of prime real estate, beach front and the growth corridors across the western boundaries of the town. The construction of a ring road will constrain and compromise the ability and value of growth and development potential. Simply put, what would be exceptional and highly desirable real estate will be relegated to second rate and low-grade suburbs exposed to relentless highway pollution in terms of noise, headlights at night and particulates matter on their doorsteps.
There are roughly 31,000 dwellings in Coffs Harbour of which about 6,000 are within 1 km of the proposed highway upgrade route. These areas comprising of west Coffs Harbour, Korora and Boambee valley currently have growth projections of over 50% so building a highway through this area is counterintuitive and will impact the rate, quality and value of that growth
4. **Population:** Losing or diminishing half of the prime real estate does not just disadvantage Coffs Harbour economically, but it undermines nation-wide initiatives to decentralise and encourage big city dwellers to move to regional centres.
A high-speed motorway cutting through Coffs Harbour's most significant growth corridor is counterintuitive if this town is to be attractive to city dwellers and other migrants. Particularly those looking for a healthy, ambient and quality lifestyle.
There is evidence that towns such as Port Macquarie have economically benefited when highway traffic was diverted via the Pacific Highway bypass. This same result cannot be expected for Coffs Harbour. The reality is that most residents do not and will not live in the city centre, they live in the suburbs and as such, those suburbs need to be optimised and protected to allow for and encourage population growth. A ringroad does not support this.
5. **Natural attributes:** The unique natural attributes of Coffs Harbour make this town an exceptional place in Australia and it would be irresponsible not to preserve these for future generations. Coffs Harbour is the only place in Australia where the Great Dividing Range meets the ocean but there is so much more with rivers and waterways, a microclimate that is considered one of the healthiest in the world and an abundance and diversity of wildlife that is rarely seen in one place. Historically, this uniqueness has not really been afforded the reverence it deserves but as our society evolves there is an increasing awareness of how special Coffs Harbour is. Building a high-speed motorway through Coffs Harbour is a retrograde step in realising the importance and potential of this unique area and keeping it on not just the national but the world map as a great place to live and visit.
6. **Regional hub:** Coffs Harbour is a regional hub and if it flourishes, so does the broader region and therefore strong investment and strategic planning have significant flow on affects. But if this

fails, not only will Coffs Harbour lose out, so will surrounding towns who depend on Coffs Harbour for services, jobs and their wealth. People moving to Coffs Harbour bring and spend money and boost the economy with cashed up city people being particularly lucrative for regional towns so conditions to encourage this must be prioritised. Byron Bay and Ballina are examples of how creating desirable places to live can enrich the community but also the region. As stated, constructing a high-speed motorway through Coffs Harbour will diminish development and growth potential including the value and desirability of real estate and this will impede on surrounding towns and their ability to develop and flourish.

7. **Existing Pacific Highway route:** There is no contention that the existing Pacific Highway through Coffs Harbour is problematic for locals, truck drivers and holiday makers and should not have been allowed to persist for so long. It is important to state that every property owner, resident and tenant within proximity of the existing Pacific Highway purchased or chose to live or conduct business there with direct knowledge of the noise and pollution exposure and real estate prices reflect this. Additionally, Coffs Harbour is a city, and cities rarely decrease in size and congestion, including the roadways. Truck drivers are also accustomed to navigating urban streets and towns, this is part of their job. So, the status quo is not abnormal, not surprising and not dangerous, it is however inconvenient.

In contrast, west Coffs Harbour was established in a quiet and peaceful area away from the pollution and congestion of the centre of town and residents and businesses intentional chose to locate there for these reasons. To construct a high-speed motorway would be completely out of character, was not a factor in the decision for most residents to live there and house prices were not discounted as a compromise to living with noise and pollution. Existing residents and businesses will be materially disadvantaged with a high-speed motorway in close proximity destroying the foundational amenity and ambience of the region.

8. **Property remediation:** Double glazing and air conditioning cannot sensibly and realistically remedy the exposure to noise and pollution and offer a quality of life to residents. Coffs Harbour has a subtropical, healthy and highly desirable climate and the reason many of us choose to live here. To expect that we shut ourselves inside our homes, deprived of refreshing and healthy sea breezes, running expensive air conditioners that we must pay running costs for as well as replacement units once they are at end of life is an insult and absolutely diminishes and disregards our quality of life. Unlike the residents living along the existing highway route, we did not sign up for this.

Double glazing will not block out the noise. Our home is about 2.5kms in a straight line from the existing highway where the gradient is similar to the proposed highway upgrade route but where the speed limit is still 60km. Our bedroom has both double glazing and sound insulation in the walls and highway noise, particularly trucks with their active, unreserved and unpoliced use of air brakes and illegal exhaust systems can still be heard in our bedroom, throughout our home and outside. It is not loud but it is present, particularly at night with the inversion layer and when the area is otherwise very quiet.

The proposed route will be 300-400m from our home in west Coffs Harbour which is marked for remediation though RMS has not yet contacted us to provide details. We are located on the side of a valley where noise reverberates and magnifies. If the highway was to go ahead at this location, noise cannot be effectively mitigated with sound barriers both during construction and when operational unless it is fully enclosed which there is no intention to do so. Early RMS/RTA reports have highlighted this fact due to the acoustic properties of the valley. This is a completely inappropriate location to build a noisy highway.

9. **Environment and habitat:** The proposed highway corridor in the valley area has the last and only remnant bushland in Coffs Harbour and is home to a rich and diverse array of flora and fauna including threatened koalas, bandicoots and countless bird species that will almost certainly be

unable to survive in the anticipated conditions that the highway will create. There is plenty of evidence about the negative effects of industrial and traffic noise on wildlife, particularly birds and koalas and also that koala relocation programs have a very low survival rate. Additionally, we have turtles, frogs, eels, crustaceans and water dragons in our waterways which already struggle with urban development and farm runoff and will almost certainly be contaminated with construction waste and dust.

One of the proposed remedies to environmental destruction is the offset program however it is largely focused on procuring land that is already covered in bush and unlikely to ever be cleared rather than procuring cleared land to be regenerated. Overall a net reduction and loss of bushland. This is a cynical deception to pretend to the community that precious natural habitat will not be reduced at the expense of tax payers. We will lose precious natural habitat and wildlife forever.

10. **Construction phase:** As stated, the RMS has no intention of adequately mitigating noise, pollution and general disruption during the 5 year construction phase, particularly for affected residents in close proximity. In some respects, this may well be the most debilitating period for Coffs Harbour.

Much of Coffs Harbour lacks footpaths and pedestrian crossings which is already an indictment on local government, but with the addition of 1000s of heavy vehicle movements and traffic from workers, this presents a serious safety issue to the community and our wildlife. There is no intention to introduce appropriate infrastructure to improve safety for pedestrians and cyclists. In the west of Coffs Harbour, we have a significant number of elderly and disabled residents as well as school children given the nearby hospital, hospice, residential care facilities, youth centre and schools. The positioning of a construction depot (Mackays Road) in the midst of an urban area is unacceptable, excessively disruptive and almost certainly going to lead to property damage through vibration and worse. And with the abysmal track record of the RMS in reimbursing property owners for damage including excessive delays and onerous evidential requirements, this is tantamount to vandalism.

To be clear, 5 years is an excessive and intolerable period of time to expose 1000s of residents to daily heavy machinery, traffic congestion in residential streets, the relentless noise of reversing motion alarms that are roughly 100 decibels in volume, vibrations which cannot be escaped regardless of closing doors and windows, dust, debris and filth. How are residents expected to live in these conditions?

11. **Health and wellbeing:** As already mentioned, most residents living along the proposed highway upgrade corridor did not purchase their property with the expectation that they would be living within close proximity to a highspeed motorway. There are many reasons for choosing to live in a peaceful and ambient location but one very important one is health. I personally know of 5 people who live very close to the proposed highway route and the Mackays Road construction depot who have severe and life-threatening illnesses and have neither the energy nor ability at this point to sell their homes, relocate or even engage with this situation. Of these people, 2 have respiratory diseases and cannot be exposed to particulates in the air which will render them prisoners of their homes once construction begins. At the least this will be debilitating but it could kill them and make their final days even more difficult and distressing than need be. Building a highway in urban areas is not just inconvenient, unpleasant and destructive to property, it can isolate frail people, it can make people ill and it can kill people. As such, it is utterly irresponsible to expose our community to such disregard for our safety.
12. **Tunnels:** With all the publicity about tunnels, it's important to highlight that if they are retained, they will cover less than 10% of the distance of the highway upgrade route. The original proposal was that 3 tunnels would cover 1.35km, the EIS now states this has been reduced to 1km within a total distance of 14km. The Coffs community has unfortunately been distracted by

the tunnel controversy. Certainly, having tunnels is better than no tunnels, however 13km of open highspeed motorway will still pass through our urban areas and many residents don't realise this.

The inclusion or otherwise of tunnels has been a focal point for many and distracted the community from the full picture. Initially, 3 tunnels were in scope, then 2, then 3 again albeit now with a reduced length.

What guarantees do we have that those 3 tunnels will not be further shortened or removed and what are the impacts of constructing those tunnels? Earlier RTA documentation posed a risk to the water table and bores as well as landslides as a result of explosive use and that there were no available mitigations. How is it possible that the community and farmers are exposed to these risks and the devastating impacts it could have on their businesses and homes as well as safety? The nature of the location to build a highway, particularly Shephards Lane through to Gatelys Road, is unsuited to intrusive large-scale road and tunnelling construction.

13. **RMS visual representations:** The recent release of the EIS, community display and Project update report yet again embellish and mask the actual look and feel of the highway as it would be in actuality. Views have been doctored showing green spaces where there are residential streets and houses, rolling hills where there would be steep excavations from the side of the mountain range and trees growing in impossible places such as rocky cut outs and mature plants that would take years to reach the size shown. Furthermore, sound barriers have been shown in various places but they are not confirmed and could take years of negotiation and resident outcry before they are installed, if ever

The glossy RMS spin has consistently been a cynical exercise in hoodwinking residents by disguising the actual proximity and visual impacts to the outlook of the Great Dividing Range backdrop of Coffs Harbour. We are custodians of this iconic place and have a responsibility to protect its unique features such as our scenic backdrop. The RMS has however consistently gone to great lengths and cost to confuse and misrepresent not only where the highway will be but what it will look like, in effect imposing a grotesque scar on our natural landscape visible from every angle that will be with us forever.

14. **Land acquisitions:** The RMS has persisted in maintaining secrecy around property acquisitions so that we don't have a clear view of how many properties will be acquired and where. Property owners are being held to ransom, fearful that if they speak up against this abuse that they will be disadvantaged with property settlement values. Property owners have been advised by their lawyers and those that have been through the acquisition process that the RMS will target them if they complain. This is a shocking and I suggest illegal practice and serves to shut down the voices of dissent from vulnerable residents and farmers. There are examples of property acquisitions in other parts of the highway upgrade where land owners were given no option but to sell after which the RMS on sold or leased the acquired land at considerable profit for service stations. Regardless of these examples, landowners, especially long-term farmers, are being deprived of development and business opportunities for their properties. Essentially, their investments and their future financial security are being stolen.

15. **2000-2019:** Since the government formally commenced due diligence into a Pacific Highway upgrade through Coffs Harbour, much has changed. So much in fact that the feasibility and sensibility of the proposed route no longer makes sense. Arguably it never did but it clearly doesn't now. Residential developments have continued expanding west such that some properties will only be metres away from highway barriers and walls. Population expansion means that the extent of the impacts has increased, the scale of remediation has therefore grown and the logistics have become more complex. This all translates into increased costs. Importantly what has also changed is road and tunnel building technology. Australia is typically behind other countries but when it comes to road and tunnel construction, we are in the dark

ages. In Europe and China for example, they are using modular tunnel building technologies to minimise impacts to road users and surrounding residents and businesses. There is no evidence that newer tunnelling capabilities have been investigated by the RMS nor whether international companies with this expertise have been engaged and options explored.

To blindly continue with a solution determined by a faceless bureaucrat based on information and technologies from 20 years ago is nothing short of stupid. It is entirely feasible that a better option is available at an acceptable price. Noting that the economic impacts to growth and development in Coffs Harbour and the region, have not been factored into the \$1.8 billion construction estimate which if so, costs would be considerably higher.

16. **Trucks versus residents:** It is apparent that the selection of the proposed highway upgrade route was not for the benefit of Coffs Harbour residents but for the convenience of the transport industry. It offers the shortest alternative route and reduces travel time which in itself is ok but it is at the expense of Coffs Harbour. Most long-haul truck drivers over the course of a year will spend only a few hours in Coffs Harbour as they pass through on their way elsewhere which may be frustrating given traffic lights and reduced speed limits. On the converse, residents generally spend 24 hours, 7 days a week here.

Simply put, the well-being and convenience of residents absolutely over-rides that of the truck drivers. This is not however the case today and does not appear to be with the proposed route. As already stated, trucks drivers used their air brakes without restraint and many have illegal noisy exhaust systems installed which the police, the EPA and the RMS are unwilling to crack down on. At least, when trucks travel through Coffs Harbour, much of the road is relatively flat and their speed is reduced which lowers the noise volume however this will be very different at speeds of 100-110kms on elevated gradients through the west of Coffs Harbour using airbrakes and illegal exhaust systems. Trucking companies and their interests are clearly prioritised over those they impact.

The well-being of residents and Coffs Harbour's economic potential for growth and development should and must be the priority and therefore the proposed route must be moved elsewhere. It doesn't stack up under the SEARS and it doesn't stack up under the EIS.

Summary:

As pointed out, the route for the proposed highway upgrade is wrong in every way for Coffs Harbour and to move forward with this is a travesty, irresponsible and an absolute failure of due diligence, community engagement and governance. None of these points raised in this submission would be an issue or at least would not impact 1000s of people if the route was in fact a bypass, but it is not, it is a ring road in the midst of an urban area.

Without doubt traffic in the centre of Coffs Harbour, particularly trucks, has a significant deleterious impact to the amenity of the whole town and it is utterly remiss of the government to have allowed this to persist for so long and to such an extent. The western ringroad however is not the right solution, it transfers rather than resolves the problem by moving it to the western suburbs of Coffs Harbour where a whole new set of issues affecting the community are created.

I submit that the RMS, state and federal governments consider alternative options with a fresh set of eyes. That this be viewed through the prism of technological advances in road construction and tunnelling that was unavailable 20 years ago and with an understanding of the full context of how a highway upgrade would strategically affect the region and explore opportunities for a solution that genuinely benefits Coffs Harbour and surroundings.

If however, the decision to foolishly move forward with this intensely flawed ringroad goes ahead, then every possible measure without budgetary constraint must be identified, implemented and locked down to minimise the impacts to residents, farmers, businesses, the environment and

indigenous heritage throughout the construction process as well as for the ongoing operations of the ringroad. Measures must be locked into construction contracts and must prioritise the actual highway construction and operation given that remediation of individual properties is largely ineffective and deeply compromised. These include the best possible sound barrier technology, sound dulling road surfaces, reduction of highway speed limits through residential areas, policing of illegal truck exhaust systems and airbrake usage and controls to protect residents during construction from noise, pollution, vibration and traffic. The environmental offset program must acquire land that will be regenerated rather than just protecting what already exists so there is no sum loss of habitat.

Thank you
Ennio Bardella