

Register of Issues by Submission Number

Note: In some cases a submission did not raise any specific issues, but stated a preference for a route option.

No.	Stated Support or Objection	Issues Raised in Submission (by Issue Tag)
1	Supports Option 1	
2	Supports Option 1	
3	Supports Option 1	
4	Supports Option 3	1B, 1G, 1H, 1I, 1M, 2H, 3A, 3D, 6L
5	Supports Option 1	
6	Supports Option 1	
7	Supports Option 3 and Objects to Option 1 and or 2	1B, 1C, 1K, 6G
8	Supports Option 2	6D
9	Supports Option 1	2K
10	Supports Option 1	
11	Supports Option 1	2K, 3E, 3E, 5C, 6I
12	Supports Option 1	
13	Supports Option 1	3C
14	Supports Option 1	
15	Supports Option 1	
16	Supports Option 1	1L, 2K, 4B, 6I
17	Supports Option 3	1M, 2D
18	Supports Option 1	
19	Supports Option 3	3A
20	Supports Option 3 and Objects to Option 1 and or 2	3A, 2E, 2G
21	Supports Option 1	2K, 3E, 1L, 4B, 5C, 6I
22	Supports any option	
23	Supports Option 1	1L, 1L, 2K, 4B, 5C, 6I
24	Objects to all options	2A, 2H, 3A, 3D
25	Objects to Option 1	2H
26	Supports Option 1	2K
27	Supports Option 1	
28	Supports Option 3	2C, 2L
29	Supports Option 3 and Objects to Option 1 and or 2	3D, 3D
30	Supports Option 3 and Objects to Option 1 and or 2	2C, 2C, 5B, 6N
31	Objects to Option 1	2D, 2H, 5B
32	Objects to all options	1C
33	Supports Option 3 and Objects to Option 1 and or 2	
34	Supports Option 3 and Objects to Option 1 and or 2	
35	Supports Option 3 and Objects to Option 1 and or 2	1K, 2C, 3A
36	Supports Option 3	2K
37	Supports Option 1	2K, 3E, 1L, 5C, 6I
38	Supports Option 1	2K, 3E, 4B, 6I
39	Supports Option 3 and Objects to Option 1 and or 2	1K, 2B, 3A, 3A, 3D
40	Supports Option 1	
41	Supports Option 3 and Objects to Option 1 and or 2	1M, 2D, 2C, 2F, 2H, 2H
42	Supports Option 1	2K, 4B, 6I
43	Supports Option 1	
44	Supports Option 1	
45	Supports Option 3 and Objects to Option 1 and or 2	2C

No.	Stated Support or Objection	Issues Raised in Submission (by Issue Tag)
46	Supports Option 3 and Objects to Option 1 and or 2	1M, 2C
47	Supports Option 3 and Objects to Option 1 and or 2	2C, 2H, 2L, 3D
48	Supports Option 3 and Objects to Option 1 and or 2	2C
49	Supports Option 3 and Objects to Option 1 and or 2	1M, 2C, 2L
50	Supports Option 3	2C
51	Supports Option 3	2L
52	Supports Option 3 and Objects to Option 1 and or 2	2C
53	Objects to Option 1	1B, 2D, 2F, 2H
54	Supports Option 3 and Objects to Option 1 and or 2	2C, 2L
55	Supports Option 1	
56	Supports Option 3	1A
57	Supports Option 1	3D
58	Supports Option 1	
59	Supports Option 3 and Objects to Option 1 and or 2	1B, 1M, 5B
60	Supports Option 3 and Objects to Option 1 and or 2	1K, 2C
61	Supports Option 3 and Objects to Option 1 and or 2	1M, 1M, 2C, 5B
62	Supports Option 1	
63	Supports Option 3 and Objects to Option 1 and or 2	1K, 2C, 6G
64	Supports Option 1	
65	Supports Option 1	2K, 5C
66	Supports Option 1	
67	Supports Option 1	
68	Supports Option 1	1N, 1L, 2K, 3E
69	Supports Option 3 and Objects to Option 1 and or 2	2L, 1J, 6G
70	Supports Option 3 and Objects to Option 1 and or 2	1B, 1H
71	Supports Option 3 and Objects to Option 1 and or 2	1C, 1C, 1K, 1M, 2C, 2D, 2E, 2F, 2G, 2H, 2K, 3A
72	Supports Option 3 and Objects to Option 1 and or 2	2L
73	Supports Option 1	1L, 2K, 3E, 3C, 3E, 4B, 5C, 6I
74	Supports Option 1	
75	Supports Option 3	
76	Supports Option 3 and Objects to Option 1 and or 2	2C
77	Supports Option 3 and Objects to Option 1 and or 2	1A, 1I, 1M, 2C, 2C, 2D
78	Supports Option 3 and Objects to Option 1 and or 2	1A, 1C, 1F, 1H, 1I, 1K, 1M, 2E, 2G, 2I, 2J, 3A
79	Supports Option 1	
80	Supports Option 1	1L, 2K, 3E, 5C
81	Supports Option 3 and Objects to Option 1 and or 2	1A, 1H, 2C
82	Supports Option 3 and Objects to Option 1 and or 2	1K, 2C
83	Supports Option 3 and Objects to Option 1 and or 2	2L
84	Supports Option 1	1F, 1O, 1N, 2K, 3K
85	Supports Option 1	1O, 1N, 2K, 3F, 5C, 6I, 6J
86	Supports Option 3 and Objects to Option 1 and or 2	1A, 1K, 1M, 2C, 2D
87	Supports Option 3 and Objects to Option 1 and or 2	1J, 2C
88	Objects to all options	6G
89	Supports Option 3 and Objects to Option 1 and or 2	1A, 1H, 1J, 1K, 2B, 2C, 2C, 2D, 3A
90	Supports Option 3 and Objects to Option 1 and or 2	1A, 1C, 1K, 2C
91	Supports Option 1	
92	Supports Option 1	
93	Supports Option 3 and Objects to Option 1 and or 2	2C
94	Supports Option 3 and Objects to Option 1 and or 2	1K, 1M, 2C, 2D, 2L, 5B

No.	Stated Support or Objection	Issues Raised in Submission (by Issue Tag)
95	Supports Option 1	2K
96	Supports Option 3 and Objects to Option 1 and or 2	1A, 2L
97	Supports Option 3 and Objects to Option 1 and or 2	2C
98	Supports Option 3 and Objects to Option 1 and or 2	1K, 1M, 2A, 2C, 2D, 2J, 2L, 5B
99	Supports Option 1	1L, 3E
100	Supports Option 1	
101	Supports Option 1	2K, 3E, 5C, 6I
102	Supports Option 1	2K, 3E, 6I
103	Objects to Option 1	1A, 1C, 1M, 2C, 2D, 2J
104	Supports Option 3 and Objects to Option 1 and or 2	1A, 2A, 2C, 2D, 2H
105	Supports Option 3	
106	Objects to Option 1	1M, 2A, 2C
107	Supports Option 1	
108	Objects to Option 1	1A, 2C, 6M
109	Supports Option 3 and Objects to Option 1 and or 2	1B, 1K, 2C
110	Supports Option 3 and Objects to Option 1 and or 2	1A, 1C, 1H, 1K, 1M, 2C, 2J, 2L
111	Supports Option 3	
112	Supports Option 3	
113	Supports Option 3	1M
114	Supports Option 3 and Objects to Option 1 and or 2	1M, 2A, 2D, 2C, 2C, 2G, 2H, 2H, 3D, 3D
115	Supports Option 3	1A, 1K, 1I, 2C
116	Supports Option 1	
117	Supports Option 1	1L, 2K, 2K, 4B, 5C
118	Supports Option 3 and Objects to Option 1 and or 2	1A, 2C
119	Supports Option 3 and Objects to Option 1 and or 2	1K, 1I, 1N
120	Supports Option 1	1H
121	Supports Option 3 and Objects to Option 1 and or 2	1A, 1K, 2C
122	Supports Option 3 and Objects to Option 1 and or 2	1K, 1I, 1N, 2C
123	Supports Option 3 and Objects to Option 1 and or 2	1K, 1M, 1M, 2C, 3A
124	Supports Option 3 and Objects to Option 1 and or 2	1A, 1M, 1K, 2C
125	Supports Option 3	2C
126	Supports Option 3	2C
127	Supports Option 1	1L
128	Supports Option 3 and Objects to Option 1 and or 2	2C, 2C
129	Supports Option 3 and Objects to Option 1 and or 2	2C
130	Supports Option 3 and Objects to Option 1 and or 2	1K, 2E, 2G, 2I, 2H, 2H
131	Supports Option 3 and Objects to Option 1 and or 2	1K, 2C
132	Supports Option 1	2K
133	Supports Option 3 and Objects to Option 1 and or 2	1A, 1C, 2C, 2D, 2I, 6D
134	Supports Option 3 and Objects to Option 1 and or 2	1K, 1H, 1M, 2C, 2D, 2E, 2G, 2L, 3C, 5B
135	Supports Option 3 and Objects to Option 1 and or 2	2C, 5B
136	Supports Option 3	2L
137	Supports Option 3	2L
138	Supports Option 3 and Objects to Option 1 and or 2	1A, 1C, 1H, 2A, 2C, 2L
139	Supports Option 3 and Objects to Option 1 and or 2	1A, 1K, 1I, 1M, 2C, 2D, 2E, H, 2J, 2L, 2B
140	Supports Option 3 and Objects to Option 1 and or 2	2C
141	Objects to all options	1A, 1C

No.	Stated Support or Objection	Issues Raised in Submission (by Issue Tag)
142	Supports Option 3 and Objects to Option 1 and or 2	2C, 2C
143	Supports Option 3 and Objects to Option 1 and or 2	1M, 2C, 2C
144		
145	Supports Option 3 and Objects to Option 1 and or 2	2C, 2H, 6M
146	Supports Option 3 and Objects to Option 1 and or 2	2C
147	Supports Option 3 and Objects to Option 1 and or 2	1A, 1B, 1C, 1E, 1G, 1H, 1K, 1M, 2C, 2D, 2L, 3D, 3D, 6A, 6B, 6K, 6J
148	Supports Option 3 and Objects to Option 1 and or 2	1K, 2C, 2C, 2F, 2G, 2H,
149	Supports Option 3 and Objects to Option 1 and or 2	1K, 2C
150	Supports Option 3 and Objects to Option 1 and or 2	2B, 2C, 2I, 2H, 2H, 6L
151	Supports Option 3 and Objects to Option 1 and or 2	1A, 1M, 1M, 2C, 2C, 2D, 2F, 2J, 3A, 5B
152	Supports Option 3 and Objects to Option 1 and or 2	1K, 1M
153	Supports Option 3 and Objects to Option 1 and or 2	1A, 2C
154	Supports Option 3 and Objects to Option 1 and or 2	1K, 2C, 2E, 2J, 2L, 3A, 5B, 6D, 6K
155	Supports Option 3 and Objects to Option 1 and or 2	1A, 1B, 1C, 1G, 1M, 2A, 2B, 2D, 2E, 2F, 2G, 2H, 2I, 2J, 2S, 3A, 3B, 3C, 3D, 4A, 4C, 5A, 5B, 5D, 6A, 6C, 6D, 6E, 6K
156	Supports Option 3 and Objects to Option 1 and or 2	1D, 1F, 1H, 1H, 1K, 1M, 1M, 2A, 2C, 2J, 2J, 3A
157	Supports Option 3 and Objects to Option 1 and or 2	1A, 1B, 1K, 1N, 2A, 2C, 2F, 2I, 2J, 2J, 3A, 6H
158	Supports Option 3 and Objects to Option 1 and or 2	1B, 1F, 1I, 2C, 6G
159	Supports Option 3 and Objects to Option 1 and or 2	1A, 2C, 2C, 2D, 2E, 2G, 2H, 2I, 2J, 3A, 3C, 3F, 5A, 6J
160	Supports Option 3 and Objects to Option 1 and or 2	2C, 2J, 2L, 3A, 5B, 6A, F, 6J
161	Supports Option 3 and Objects to Option 1 and or 2	2C, 2D, 4C, 5B
162	Supports Option 3 and Objects to Option 1 and or 2	1A, 1C, 1C, 1H, 1K, 1M, 2C, 2D, 2L, 6E

Agency or Organisation	Stated Support or Objection	Issues Raised in Submission (by Issue Tag)
Office of Environment and Heritage (OEH)	Objects to Option 1 and Option 2	2C, 2D, 2E, 2F, 2G, 2H, 2I, 2J, 3A, 3D, 4D, 5B, 6C, 6M
South Coast Regional Advisory Committee (SCRACS) – Part of OEH	Supports Option 3 and Objects to Option 1 and or 2	1B, 1G, 1M, 2A, 2B, 2C, 2D, 2E, 2F, 2G, 2H, 2I, 3A, 3C, 5A, 5D, 6C, 6D, 6H
NSW Office of Water (NOW)	Supports Option 3 and Objects to Option 1 and or 2	2C, 6H
DoPI (South Coast Regional Office)	Supports Option 1	
Department of Industry and Investment	No stated support or objection	
Endeavour Energy	Supports Option 1	
Roads and Maritime Services (RMS)	Supports Option 1	1L
Nature Conservation Council of NSW	Supports Option 3 and Objects to Option 1 and or 2	2A, 2C, 2D, 2H, 2I, 2J, 6L, 6M

Summary and Description of Issues

TAG	Issue Summary	Detailed Issue Description
1. Strategic Justification, Traffic and Benefit Cost Analysis (BCA)		
Project Justification and Alternatives		
1A	The main issue is the river crossing – the NNLR cannot be justified on the basis of improving river crossing.	<p>The major factor in causing traffic congestion is the Princes Highway Bridge crossing over the Shoalhaven River and the constrained road a traffic signal system at the southern end of the bridge. This often prevents Illaroo Road traffic from entering the Princes Highway, causing the congestion on Illaroo Road.</p> <p>The construction of the NNLR cannot be justified on the basis of its contribution to reducing congestion on the highway at the bridges. All a Link Rd achieves in relation to this issue is to provide access and egress to the Princes Highway via two routes rather than one. However traffic from all directions still has to traverse the highway across the Shoalhaven River Bridges.</p> <p>The NNLR would just transfer the traffic, and the resulting congestion problems and maintenance costs, onto the Princes Highway. The bottle neck will just be moved to another place, in the absence of a 3rd bridge over the Shoalhaven River.</p> <p>The ever-growing number of cars and traffic delays on the Princes Highway can only be resolved with the building of a new bridge over the Shoalhaven River. Council should give priority to working with the RMS to get the real problem rectified, rather than spend around 18 million dollars of taxpayer's money for a "no solution" road.</p>
1B	The Central or Southern routes cannot be justified in terms of relieving traffic congestion on Illaroo Rd.	<p>The traffic benefits of the NNLR are unlikely to be achieved to the level predicted and cannot be justified in terms of relieving traffic congestion on Illaroo Rd.</p> <p>The Central Option is a longer journey (by almost 2km) and so would therefore not attract motorists off Illaroo Road. Both the Southern and Northern routes are longer than the Central route. Existing and future motorists are not likely to be attracted to the proposed Central and Southern Link Rd routes as these would be considerably longer and more time and petrol-consuming than the Illaroo Rd route.</p>
1C	Alternative traffic solutions should be investigated.	<p>Council lodged the Part 3A application for the NNLR but has not implemented improvements to intersections with the Princes Highway as part of the package of strategic traffic planning measures set out in the Structure Plan. Justification for undertaking this proposal over the other measures should be provided.</p> <p>In all the Link Road documentation there is no mention of any initiatives that could be considered to reduce the volume of "local" vehicular traffic going into the Nowra CBD. This could include rezoning for higher density housing near the CBD, providing better public transport and actively promoting the use of bicycles as an efficient transport alternative for commuting to school, work and shopping.</p> <p>We do not need a link Road, the money could be spent better on other alternatives including:</p> <ul style="list-style-type: none"> ▪ Options to reduce the overall amount of traffic in the local road network. Improvements to the bicycle network, and walking network might take pressure off local road network. ▪ Options to improve the capacity of the existing bridges and the capacity of the constrained road a traffic signal system at the southern end of the bridge. ▪ Remotely monitoring and actively manage the Bridge Road/highway intersection. ▪ Modifying the Pleasant Way/highway intersection.

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		<ul style="list-style-type: none"> Improving bus network.
		This project is not a priority. The money required to complete the project could be spent in a much more productive project.
1D	The strategic objectives of the NNLR are unclear.	<p>The EAR and the AECOM report present a confused picture of the role of the NNLR including:</p> <ul style="list-style-type: none"> Access from NN to Nowra CBD and south of the river (AECOM and JBA) Access between NN and Bomaderry (AECOM and NBSP) Access between NN and areas to the north (AECOM).
1E	Justification for not assessing the RCR options with the Southern and Northern Options.	The EA discusses the impact of the NNLR on the surrounding road network and analyses how the NNLR – Central Option performs with and without the construction of other road upgrades (MVRLK and RCR Improvements). It does not, however, compare the Northern and Southern option with these other road upgrades.
1F	RCR measures are unclear and banning right turn from Illaroo Road into Princes Highway is not acceptable.	<p>Banning right turn from Princes Highway to Illaroo Road would upset many current Illaroo Road residents, particularly those who live east of McMahons Road and visitors to the Nowra Gold Club.</p> <p>Note error in JBA EAR report which does not include the banned right hand turn as part of the RCR measures.</p>
Strategic Planning		
1G	Impacts from the Central and Southern Routes are not consistent with the State Plan, the SCRS and the NBSP.	<p>The NNLR is inconsistent with the NSW State Plan to improve biodiversity, i.e. to increase recovery of threatened species, populations and ecological communities not just to avoid significant impacts on them. The strategic assessment is not in compliance with the DGRs.</p> <p>The Central and Southern options are not consistent with the SC Regional Strategy because they would not maintain or enhance the regionally significant biodiversity of the Bomaderry Creek Regional Park or direct development away from this area known to be important for conservation.</p> <p>The Northern route is the only route consistent with the strategic objectives of the NBSP to provide transport infrastructure for future residents whilst at the same time ensuring that the values of the BCRP and Bushland are maintained.</p> <p>The Northern Route would be suitable for growth of traffic generated in the new urban land release areas to the west including Capitallee, Bangalee, and Gypsy Point.</p>
Traffic Assessment		
1H	Flawed traffic analysis	<p>The AECOM study has not compared the VKT and VHT analysis for Illaroo Road itself.</p> <p>Most of the residents that reside to the east and south of the North Nowra Shops will continue to go down Illaroo Rd so the Central Option will have less than an estimated 10% impact on the Illaroo traffic levels and the Northern option around 8.5%, so the traffic impact difference between the Central and Northern options is only 1.5%.</p> <p>The assessment dismisses the diversion of traffic towards Illaroo Road during the PM peak for the north bound journey as a minor diversion with no adverse consequences.</p> <p>During the PM peak there is little congestion due to the dedicated slip lane off the bridge and so higher PM (vs AM) accident rates are due to higher speeds and low westerly sun in the eyes of motorists. The only significant congestion experienced early in the PM peak is caused by the school where it can take up to three traffic light changes to get through.</p> <p>Traffic delays on Illaroo Road are mostly caused by school traffic, buses,</p>

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		drop-off and children crossing at the lights. Council should consider measures to minimise school traffic related congestion, including an overpass and bus and car stops.
		The report does not mention the Bangalee West future residential area identified in the structure plan.
1I	Central option would impact local traffic network	Narang Road would become an unsafe intersection due to the close proximity to the school zone and poor visibility for northbound traffic potentially increasing the number of accidents at this intersection.
		Traffic entering the highway at Narang Rd from the proposed Central Option would become even more congested than Illaroo Road. There is already congestion in this part of the Highway that this road would make worse.
		The Central Option will only cause more traffic problems as it is only a short distance from the existing Illaroo Road/Princes Highway connection.
		This option dumps traffic onto a roundabout on the Princes Highway with only 2 directions to turn.
1J	The traffic modelling does not rule out Option 3.	<p>The conclusion that the Northern Option fails to meet project objectives is not substantiated by the AECOM modelling as follows:</p> <ul style="list-style-type: none"> Each Link Road option has a similar average travel time along Illaroo Road between 9 to 10 minutes. "The improvement in Level of Service during the AM peak at the McMahon's Road intersections with Illaroo Road indicates that Illaroo Road will become less congested with the construction of any of the Link Roads and the flow of traffic will improve from residential roads onto Illaroo Road."
1K	The Northern Option provides a better connection to the local and regional road network.	<p>The northern option provides better access to Kangaroo Valley, Bomaderry, Hume Highway, Wollongong, Sydney as well as access north and south on the Princes Highway. The Central and Southern Options only provide highway access.</p> <p>This option better directs traffic to a major destination such as Kangaroo Valley, Bomaderry railway station, basketball stadium and sports fields.</p> <p>It will give traffic from North Nowra the choice of turning four directions.</p>
1L	Option 3 will impact heavily on existing road network.	<p>The proposed intersection of Option 3 at Moss Vale Road would involve a roundabout which is close to the existing roundabout on the Princess Highway. This new roundabout will impact the already congested roundabout during peak times.</p> <p>Option 3 will introduce a new intersection with West Cambewarra Road which is undesirable from a traffic perspective.</p>
Benefit/Cost Analysis Issues		
1M	The BCA is flawed and there are significant doubts regarding the comparative costings for the routes – in particular in regards to the construction of Options 1 and 2.	<p>Common sense would suggest that the Central and Southern options involving major bridges and approaches over the Gorge (with major construction requiring heavy machinery to place the spans) would be the most expensive. Yet the Central route is estimated to be the least expensive.</p> <p>The Northern route road and bridge do not seem to require the same heavy engineering as the other routes, so the higher estimated costs for this route seem questionable. Option 3 should be the most economically viable.</p>

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		<p>The cost of building a tall bridge over Bomaderry Creek, with difficult access, including moving power lines, re-locating a large water supply pipeline, plus exit/entry provision for Narang Road businesses, tennis courts & the picnic area must exceed the cost of a small bridge with easy access on the West Cambewarra Rd option.</p> <p>Independent costing is needed to verify these cost estimates. There seems to be much greater potential for cost overruns with the Central and Southern Options.</p> <p>The BCA does not include an economic value for the bushland biodiversity that is degraded and put at risk by the Central Option. There is also the potential loss of tourist revenue.</p> <p>Not enough weight has been given to the economic and social values of the natural bushland. The value of the park has not been recognised to the community. No price has been put on the value of losing such a valuable piece of habitat and recreational community resource.</p>
1N	The Southern Route is not viable	<p>This option is unlikely to be considered due to the creek crossing and landscape making a new road by this route would be very time consuming.</p> <p>The southern route appears to have the largest cost (30% higher cost) with buy backs off the residents, the highest cost with the bridge crossing over the Bomaderry Creek and it will only move slightly more vehicles than the central route.</p>
1O	Option 3 is not viable	<p>The northern route is the least viable because:</p> <p>Of the higher capital and ongoing maintenance and transport costs.</p> <ul style="list-style-type: none"> ■ It will not move sufficient traffic and will deliver the least benefits for the cost involved. ■ It substantial clearing of bushland along the southern side of the existing West Cambewarra Road. ■ It will not reduce traffic substantially enough through Illaroo Road to have any benefit.

TAG	Issue Summary	Detailed Issue Description
2. Biodiversity		
General Biodiversity Issues		
2A	Threatened Species assessments are not consistent with the guidelines. Threatened Species assessment guidelines, The Assessment of Significance and underestimate the impacts to species.	<p>Threatened Species assessments are not consistent with the Threatened Species assessment guidelines, The Assessment of Significance and so not consistent with the DGRs.</p> <p>These concerns arise from several issues, including incomplete and absent Threatened Species surveys, incorrect statements and failure to address cumulative local impacts rather than regional impacts. Survey work for several Threatened Species and specific for these proposals were not completed or reported in the EA at the time of the release of the EIA for public comment. These include: Giant Burrowing Frog, Spotted-tailed Quoll, Grey-headed Flying Fox, and Eastern Pygmy Possum. No targeted surveys were conducted for the Broad-headed Snake and Brittle Midge Orchid.</p> <p>In the case of the Broad-headed snake, targeted surveys were not undertaken because of an assumption that no suitable habitat was present in the area. This is not the case. Habitat is considered to be located in the Park and the Bushland.</p> <p>In the case of the Brittle Midge Orchid, it seems that data from other surveys has been incorrectly applied in the maps provided and no surveys specific for this study were carried out. Yet surveys conducted by others shows that specimens of the Brittle Midge Orchid are present on the route of the power line easement affected by the Central route. Therefore this route would directly impact on this threatened species.</p> <p>Another serious omission from the EA is an assessment of the Eastern Pygmy Possum, which is understood to have been identified recently in the Bushland.</p> <p>There are questions also about the approach taken to Threatened Species Impact Assessment. The guidelines advise that the factors to be taken into consideration should focus particularly on impacts at the local, rather than the regional environment. This shift in emphasis to local impacts was because the long term loss of biodiversity at all levels arises mainly from the accumulation of losses and depletions of populations at a local level. The emphasis in this EA is on regional rather than local impacts resulting in a failure to properly assess the significance of the impacts on the local populations of these Threatened species.</p> <p>The assessments focus on individual specimen and so fail to address the implications of the impact on each of the relevant species' habitat.</p> <p>Every Environmental Assessment prepared for public display should comply with the Director-General Requirements. For example, the DEC guidelines for threatened species assessment were not complied with as far as the following species are concerned: Giant Burrowing Frog, Spotted-tailed Quoll, Grey headed Flying Fox and Eastern Pygmy Possum. In fact the Eastern Pygmy Possum has now been found in the Bushland and yet this very important discovery of another threatened species has not been acknowledged in the assessment. The location of the Brittle Midge Orchid (<i>Genoplesium baueri</i>) was incorrectly mapped and resulted in a failure to realise that it occurs on the central route. Thus there has been no assessment provided for this species. There</p>

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		<p>have been no targeted surveys for the Broad headed Snake based on the incorrect assertion that there is no suitable habitat for this species. The DoP should demand that all of this unfinished work be finalised and then resubmit a completed job for further community comment.</p> <p>Impacts to the Lowland Rainforest EC are unclear for each option. Better mapping of the Lowland Rainforest EEC needs to be provided. No specific mitigation measures have been provided for the EEC.</p> <p>Further surveys are required to determine if vegetation includes breeding sites for the Glossy Black-cockatoo, Gang-gang Cockatoo, Masked Owl, Sooty and Powerful Owls. The surveys will also need to determine whether the loss of breeding habitat can be offset.</p>
2B	<p>The Vegetation and habitat loss and biodiversity impacts of the route options have been under-estimated, especially for the Central and Southern Routes, and so the Route Options Comparison is flawed.</p>	<p>Estimates of vegetation loss appear to relate to the areas cleared for the roads and not the additional vegetation clearance that would be needed for the construction of the proposed bridges and the elevated approaches and for the Central option, the relocation of the water pipeline and power line across the gorge due to the road and bridge route. There is also no inclusion in clearance areas for sedimentation basins which may be required. Accordingly the loss of native vegetation involved seems to represent a considerable under-estimate.</p> <p>Gaining access to the difficult Central and Southern proposed bridge sites for very large plant and equipment items would have serious implications for native vegetation and the need to establish secure footings for the bridge supports would almost certainly result in clearing of the vegetation within the gorge for a considerable distance around these footings.</p> <p>The Central and Southern Options should be rejected on the basis of the precautionary principle, that "where there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental damage."</p> <p>Accordingly, the Northern option is the only route that should be considered for approval</p>
2C	<p>Fragmentation of bushland in and around BCRP caused by Central Option and the Southern Option affecting very high conservation and biodiversity values and impacting threatened species.</p> <p>The proposed NNLR will have a detrimental impact on the biodiversity of the BCRP.</p>	<p>The central route has a significant fragmentation impact on the Regional Park. It effectively divides the bushland and Regional Park in two, creating a significant barrier between two areas of bushland. The current single unsealed utility service track cannot be compared with a two lane sealed public road carrying thousands of vehicles per day, with maintained road shoulders and verges. In particular the GBF, YBG, GBCX utilise and cross the existing easement.</p> <p>The impacts of fragmentation are not confined to the actual infrastructure corridor but extend into the bushland on both sides of the corridor for some distance due to increased edge effects.</p> <p>This option has significant implications for ecological functioning of the bushland due to impacts including habitat change (from changes to lighting, night-time lights, drainage and runoff and micro-climate changes), road maintenance, vehicle accidents, vandalism, littering, weed invasion and increased access for illegal bikes.</p> <p>The fragmentation would not be consistent with the ecological integrity of the BCRP, nor would it maintain or enhance significant habitat corridors or conserve natural values consistent with the BCRP management objectives.</p>

TAG	Issue Summary	Detailed Issue Description
		<p>Fragmentation would isolate plants and animals, lowering numbers of individual species, increasing vehicle animal collisions and potentially resulting in local extinction for native and threatened species.</p> <p>BCRP is a highly valued natural area. It is home to hundreds of species which will be threatened by the NNLR and which needs to be protected for future generations.</p> <p>The rainforest itself is very valuable as it represents a unique environment within the sandstone gorge.</p> <p>The animal species the system supports is precious. Many native animals will become roadkill.</p>
Specific Threatened Species Impacts		
2D	Impacts to Bomaderry Zieria specimen close to the Central Route Option	<p>Indirect impacts to the two <i>Z. baeuerlennii</i> closest to the central route alignment, located 13 metres from the centreline, are likely and the long term persistence of two plants is doubtful. The narrower road alignment may not be achievable making direct or indirect impacts more likely. The EAR erroneously states the distance to the BZ specimen as 10 m from the road edge but it should be 5 m.</p> <p>It may be possible for the <i>Z. baeuerlennii</i> specimen could be protected during the construction phase, however the claim of "no direct impacts" for the Bomaderry Zieria must be questioned, as plants are at risk of being destroyed during construction.</p> <p>In the longer term the current single unsealed utility service track cannot be compared with a two lane sealed public road carrying thousands of vehicles per day, with maintained road shoulders and verges. As such it is highly likely that indirect impacts will kill the individual plants. Indirect impacts include:</p> <ul style="list-style-type: none"> ▪ habitat change (including changes to water flows, drainage and micro-climate and bushfires), ▪ road maintenance, ▪ vehicle accidents, ▪ rabbit herbivory; ▪ vandalism, ▪ littering ▪ weed invasion. This is the major long term threat to the <i>Z. baeuerlennii</i> as the Central Option would create a corridor for the movement of weeds into the population of <i>Z. baeuerlennii</i> to a much larger degree than the existing utility easement and service track. The Central Route would introduce a weed vector through the centre of the BCRP, in close proximity to the <i>Z. baeuerlennii</i>. <p>These impacts could further compromise the long term viability of the northern sub-populations of the species and mitigation measures would be unlikely to be effective.</p>
2E	Impacts to two <i>Eucalyptus langleyi</i> specimens would significantly increase the risk of extinction of	<p>A 10% reduction in the adult population in addition to the recent 37% reduction in the population further reduces the viability of the local Endangered Population of this species, increasing the risk of extinction of the local population. An assessment of the impacts on this local Endangered Population should therefore be conducted.</p>

TAG	Issue Summary	Detailed Issue Description
	the local population.	<p>The Central route might result in the loss of more plants (in particular S4 near the pipeline – which would make the total loss more like 15%) because of the area required for the construction of the bridge and for the dismantling and relocation of the existing water pipe line and power line across the Gorge and so impacts have been under-estimated.</p> <p>The proposed mitigation strategy of adding the land where the two plants likely to be destroyed to the Park is a strange suggestion and not considered to be an effective means of counteracting the impacts from the bridge construction and relocation of the water pipeline and the power line on the habitat of this species.</p> <p>Raising the height of the bridge is unlikely to prevent impacts to the species.</p>
2F	Impacts to Giant Burrowing Frog (GBF) from cutting through potential habitat.	<p>The 'siting' of the GBF was confirmed by Daly and should be treated as a confirmed siting.</p> <p>GBF assessment is not consistent with the DGRs. The potential impacts have not been correctly assessed and the proposed measures to avoid or mitigate impacts are totally inadequate, with no assessment of the feasibility, reliability and effectiveness, as required. Impacts to GBF from cutting through potential habitat needs to be further considered and more mitigation included. In particular consider further an underpass.</p> <p>No possibility of mortality to this small population should be permitted.</p> <p>The current track does not form a barrier to movement of the GBF. The track is rarely used and not used at night time when the GBF are more likely to be active. The impact of the Central Option is under-stated.</p> <p>The EAR makes an error in the location and breeding habitat and the name of relevant vegetation type (sandstone sedge instead of kunzea shrubland). The Central Route option bisects the largest northern occurrence of Kunzea Shrubland which is prime habitat for the GBF (not sub-optimal) and extends as a single habitat across the Central Option from north to south.</p> <p>The assessment of impact to GBF that there would be no need for GBF to traverse the road because breeding sites are identified only on the northern side of the corridor is at odds with the observation that the GBF moves great distances from breeding areas in search of food. The Central Option would create a major barrier to the frog and prove a threat to its survival.</p> <p>The bridge crossing is located to the east of the GBF habitat and so would be unlikely to act as an effective underpass for GBF.</p>
2G	Impacts to <i>Genoplesium baueri</i> and <i>Hibbertia sp. nov 'Menai'</i> from the Central and Southern Options are significant	<p>Field surveys were not undertaken to assess the number of plants this species to be impacted by this proposal and the Biodiversity Assessment used others' data collected for a separate purpose. Due to mapping/coordinate errors, the Central Route will directly impact on 3 individual <i>Genoplesium baueri</i>, not 1 as stated in the Biodiversity Assessment. The Southern Route will directly impact on 9 individual <i>Genoplesium baueri</i>.</p> <p>The EA relies on claims that impacts are unlikely because of the</p>

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		<p>occurrence of this species elsewhere in the Shoalhaven Region, rather than concentrating on the impact on the habitat of this local population. The population of this species in the Bomaderry Creek bushland is significant, and the survey results not definitive. Further survey is required to better assess the impacts and to develop appropriate mitigation measures and appropriate off-sets.</p> <p>Changes to the micro-climate, especially drainage/hydrology, will affect the long-term survival of the species in the surrounding habitat. The existing power line easement provides habitat for this species.</p> <p>Impacts to <i>Hibbertia sp. nov 'Menai'</i> from the Central Option and the Southern Option are significant in regards to the local population.</p>
2H	<p>Impact to Spotted-tailed Quoll (STQ) from vehicle collision will be significant for the Central Route and the Southern Route.</p> <p>Impact to Eastern Pygmy Possum (EPP) from vehicle collision will be significant for the Central and Southern Routes.</p> <p>Impacts to Grey-headed Flying Fox (GHFF) are likely to be significant from the Central and Southern Routes</p> <p>The Central and Southern routes would have impacts on Yellow-bellied Glider (YBG) habitat.</p>	<p>STQ This species is known to occur within the local area and the study area does provide suitable shelter/breeding and foraging habitat for the Spotted-tailed Quoll, therefore it is Expected that the home range of this species would cover the subject site. Impacts from vehicle collision are likely to be significant due to the large amount of habitat on either side of the Central and Southern Option, which can lead to a loss of top order predators and change the ecological function of an area. Further surveys are necessary, and additional mitigation measures required.</p> <p>EPP The EPP is expected to occur within the local area. Impacts from vehicle collision are likely to be significant due to the large amount of habitat on either side of the Central and Southern Options. Further surveys are necessary, and additional mitigation measures required.</p> <p>GHFF The survey area is inadequate since it fails to include the maternal camp for the GHFF.</p> <p>It is likely given the size of the colony that the GHFF range widely within the Bushland and Park where there is suitable habitat and a significant amount of feed trees. The Flying Fox fly well beyond the immediate campsite area to feed on the Red Bloodwood, which is a significant component of the Grey Gum-stringy bark Forest/Woodland. This vegetation community is extensive throughout the Bushland and Park and would be the vegetation community most affected by the Southern Route. Both option 1 and option 2 has the potential to impact habitat critical to the survival of the grey-headed flying foxes and that council has inadequately considered the impact in their proposal."</p> <p>The Flying foxes are also known to disperse north along Bomaderry Creek so that the Central Option and Northern Option bridges would present a hazard to the safety of both animals and humans. There is also concern regarding the impacts of the proposed road construction including disturbance due to the noise and vibration of heavy machinery during construction, causing animals to fly during the day and to shift their campsite or abandon it altogether.</p> <p>Grey-headed Flying-fox is a Commonwealth listed species and should be included in Section 8.3.</p> <p>YBG Grey Gum-Stringybark Forest/ Woodland around the gorge are the core</p>

TAG	Issue Summary	Detailed Issue Description
		<p>habitat for the Yellow-bellied Glider, Scribbly Gum provides food resources and tall Spotted Gums facilitate gliding and also provide den sites. These trees should all be taken into account as habitat for the Yellow-bellied Glider. These communities are present in the vicinity of the Central route, so it is clear that the Central route would have impacts on Yellow-bellied Glider habitat.</p> <p>Feed trees will be lost from the alignment of the Southern Route.</p> <p>Loss and fragmentation of habitat is a key threatening process for Yellow-bellied Glider, and such a small population as it present in the BCRP is unlikely to survive such fragmentation so the species may be forced into local extinction.</p>
Biodiversity Mitigation and Offsets		
2I	Biodiversity mitigation measures are unlikely to be effective and need to be further considered	<p>Assessment of the practicality and effectiveness of mitigation measures needs to be provided. In particular:</p> <ul style="list-style-type: none"> ▪ 60kph speed limit is not expected to significantly reduce the number of collisions. ▪ There is evidence of the effectiveness of road signage. ▪ Effectiveness of overpasses and underpasses are unproven. ▪ The feasibility of the road narrowing measure. <p>This should include consideration of the following:</p> <ul style="list-style-type: none"> ▪ Inclusion of terrestrial underpasses. ▪ Reduce the road corridor width along the length of the road. ▪ Predictive modelling of animal vehicle collision to develop more comprehensive range of mitigation measures to avoid animal vehicle collisions. <p>EMP should be done prior to approval for construction otherwise it is too late.</p>
2J	The proposed offset is not adequate or acceptable.	<p>The proposed 50 ha biodiversity off-set area will not ameliorate the effects of habitat fragmentation and isolation of the Central Route Option. Much of the proposed offset area is weed infested. As such the proposed offset approach is not consistent with the OEH BioBanking scheme.</p> <p>The land swap deal that Council is offering as a sweetener means the reserve will be burdened with a weed infested area.</p> <p>This Bushland is already managed very well with a joint arrangement between the various government agencies and the community (through the Bomaderry Creek landcare/ Bushcare Group). The proposal to transfer land from Council to OEH therefore make no sense from a practical management sense and certainly does nothing to enhance the biodiversity values of the Bushland. How can a transfer of land from one agency to another in return for a destructive road through the middle of it all be of any benefit to the wildlife, cultural resources or the recreating public?</p> <p>This offer is not considered to be compensation. From an ecological perspective the Bushland and Park are integral parts of the same complex landscape. There are no natural barriers between them, only the administrative boundaries due to administration of the Park by OEH</p>

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		<p>and the remaining parts of the bushland by Shoalhaven City Council.</p> <p>The loss of overall landscape and biodiversity values due to a road and bridge following the Central or Southern Route cannot be compensated by an exchange of ownership for part of the Bushland. This offer would still constitute an overall loss.</p> <p>SCC should specify whether it will provide funding or contribution to the future management of the offset sites. Much of the existing conservation and weed management work is funded by community grants which are not available to OEH – so there is not reasons to hand over the land to OEH.</p>
Biodiversity – Option Preferences		
2K	Option 1 follows an existing, permanently cleared service corridor whereas bushland would be required to be cleared for almost the entire lengths of option 2 and 3.	<p>Less bushland would be required to be cleared for option 1. Option 2 and 3 will require substantially more bushland clearing.</p> <p>It avoids further environmental disturbance by following the cleared route of the existing overhead electricity supply line and the underground trunk water main - both having been in existence for approximately 30 years or more.</p> <p>The crossing point of Bomaderry Creek for option 1 already has the elevated electricity line and trunk water main crossings, and it is appropriate that the road, water main and electricity line crossing points be grouped together for access and maintenance purposes.</p> <p>The northern route will destroy more bushland than the other more southern options because the road simply can't be built along the existing West Cambewarra Road (it will need to be built parallel to the south of West Cambewarra Road into bushland as identified in the studies resulting in substantial vegetation loss far exceeding that of either the Central or southern routes).</p>
2L	Option 3 road already exists.	<p>The west Cambewarra Northern Option is the option that will cause the least amount of environmental damage because it skirts the BCRP and does not cut through it.</p> <p>The northern option will result in less impact on the noise, pollution and sustainability of the local fauna and fauna and will not impact on the bushland to any significant extent.</p> <p>The road is set back 50m from the bush and will provide local residents with privacy and a natural noise barrier. Additionally safety is improved.</p>

TAG	Issue Summary	Detailed Issue Description
3. Impacts to BCRP Values and Amenity		
3A	Fragmentation of bushland in and around BCRP caused by Central Option affecting recreational, educational, cultural and tourism values, including visual and amenity impacts to visitor attractions and park facilities.	<p>The central route has a significant fragmentation impact on the Regional Park. It effectively divides the bushland and Regional Park in two, creating a significant barrier between two areas of bushland. The fragmentation would not be consistent with the cultural integrity of the BCRP, nor would it maintain or enhance significant landscape, cultural values, public appreciation, sustainable visitor use etc. consistent with the BCRP management objectives.</p> <p>The current single unsealed utility service track cannot be compared with a two lane sealed public road carrying thousands of vehicles per day, with maintained road shoulders and verges. The impacts of fragmentation are not confined to the actual infrastructure corridor but extend into the bushland on both sides of the corridor for some distance. This option impedes the recreational use and enjoyment (e.g. walking tracks, picnic facilities). The current integrity of the Bomaderry bushland provides an opportunity for residents and tourists to escape the urban environment. The central option will significantly impact on the integrity of the bushland and enjoyment by locals and tourists.</p> <p>The impacts to the visitor facilities would be severe, including:</p> <ul style="list-style-type: none"> ▪ Aboriginal Heritage interpretation and Reconciliation Wall. ▪ Access to the facilities and the weir would be from underneath the bridge approaches, destroying quiet ambience of the picnic area. ▪ Walk to Bernie's Lookout would be affected and access by disabled people made more difficult or impossible. ▪ The walking track along the water pipeline and power line alignment would be lost. <p>The central route adjacent to the Park picnic area would have particularly severe impacts on recreational and educational values and the tourism values of the bushland as a regional attraction would be effectively lost.</p> <p>Both the southern and central routes require large elevated bridges across the Bomaderry Creek gorge and would have a significant impact on visual amenity and the natural setting of visitor attractions and facilities (including walking tracks, picnic area, lookouts) and the natural vistas of the Gorge itself in the Regional Park or adjacent bushland.</p> <p>The Central Option route would result in a road destroying the entrance and parking area of the Bomaderry Creek Regional Park and passing within a few metres of the picnic area.</p>

TAG	Issue Summary	Detailed Issue Description
3B	Impact to value of and management of infrastructure and facilities provided in the BCRP.	<p>The central route bisects the BCRP and is close to visitor facilities including walking tracks, lookouts, picnic tables, barbecues, toilets, children's play feature and an Aboriginal mural. If this route was constructed it would render much of this infrastructure not able to be used. The infrastructure would need to be replaced elsewhere in the Park at significant cost, environmental impact and loss of amenity and function.</p> <p>Park management issues need to be further addressed.</p>
3C	Access to the BCRP facilities and trails will be affected by the Central Option.	<p>The Central Option will impact on the existing access arrangements for the walking trails and the picnic ground and associated facilities.</p> <p>No designs for alternative access arrangements have been provided. A new entrance would have to be provided and a new parking area within the Park. Besides the impact of this road on the extensive Landcare regeneration work carried over many years adjacent to the Park entrance, there would be additional impacts caused by the development of the new entrance/parking area. With the absence of any comment on these matters one must be left with the question of who would provide the new entrance and who would pay for it. It is strongly suspected that no thought has been given to these matters and that the costs involved have not been factored into the estimates for Option 1. How can the proponent assure us that access will be improved if these basic details have not been considered?</p> <p>This sealed walking track was built on a level gradient by the Bomaderry Rotary Club in the 1980s for access by the disabled to Bernies Lookout and the Camellia Garden situated north of the picnic area. Option 1 would cut off any future access for the disabled to these features at the northern end of the Bushland. Thus approval for an Option 1 route would in effect close off this excellent outdoor opportunity from use by the disabled – the only such facility provided in the Bushland.</p> <p>The concept design of Option 1 does do not allow for an exit from Nerang Rd into the Picnic area or the start of the creek walks. A safe two way underpass or access route would be needed just over the bridge crossing Bomaderry Creek to enable walkers to park their car and exit either the Bomaderry side or the North Nowra side into the new link road safely.</p>

TAG	Issue Summary	Detailed Issue Description
		<p>I note that the preliminary road and bridge design for Option 1 (Central Route) has not specifically shown the access to the Bomaderry Creek picnic area. The existing picnic area will have greater importance and access for persons with mobility difficulties can be improved.</p> <p>Access for people with disabilities and the elderly will be seriously compromised with the loss of the level walkway to the old Camelia garden. In the Bomaderry area there are few accessible tracks into the bushland for people with disabilities and the elderly.</p> <p>The claim made by council that the road will make the park more accessible to the public is disingenuous. For many years we passed close by without even knowing it was there for lack of signage. This is Nowra's best kept secret.</p>
3D	Impacts to the perceived value of the BCRP and surrounding bushland leading to an increase in anti-social behaviour from the Central Option / Southern Option.	<p>The central route would significantly increase opportunities for vandalism, arson, littering and rubbish dumping in the Park as it would introduce vehicle movements to the central portion, which is relatively protected at present. The location of a transport corridor through the bushland may lower community perceptions of the value of the area and result in increased antisocial behaviour.</p> <p>The Southern Route would create opportunities for vandalism, arson, littering and rubbish dumping to the Park's edges but would have significant impacts on the wider Bomaderry bushland.</p>
3E	Option 3 will heavily impact on residential amenity and ambience along West Cambewarra Road.	<p>Option 3 will heavily impact on every resident and property owner along the West Cambewarra road – and will increase traffic along Cambewarra Road past the Bomaderry public school and Bomaderry High School.</p> <p>The ambience and natural beauty of West Cambewarra Road, wildlife habitat to numerous bird, animal and native plant species would be totally destroyed should Option 3 become a reality.</p> <p>West Cambewarra Road and the junction at its eastern end with the Bomaderry Creek provides high quality recreation activities for bushwalkers, cyclists, fitness runners and fitness walkers. This option would destroy that for the locals who presently can enjoy the benefit.</p>
3F	The southern option will heavily impact on the environmental values of the bushland and residential amenity.	<p>The southern option will have the largest environmental impact with nearly the full length travelling through bushland. It will also disturb the highest number of residents.</p>

TAG	Issue Summary	Detailed Issue Description
4. Noise Impacts (Note: noise impacts to the amenity values of visitor facilities in the BCRP are generally included in Issue 3).		
4A	Noise impacts to residences from Gorge Bridges.	<p>Road noise from the Central Option would take away from the current quiet, peaceful experience and there would be a loss of social benefits such as a feeling of escape from the pressures of urban life.</p> <p>Central and Southern Option Bridges would cause noise to reverberate down the gorge to the detriment of residents at the southern end.</p>
4B	Option 2 and 3 will have the most noise impact on residents.	<p>The Central Option will have the least impact on residents for noise and air pollution and requires the least amount of Noise Mitigation measures.</p> <p>Significant noise mitigation work is required for Option 3.</p>
4C	Noise mitigation on the Northern Option should be by setback.	If the Road is set back along the northern option then this would enable the She-oak trees for the Glossy Black Cockatoo to be retained and lessen the impact on this species.
4D	Discrepancy in the noise monitoring figures.	Table 7.4 of the AECOM report indicates existing noise levels at each logger location as well as other locations. It is not clear to OEH how the levels in Table 7.4 at logger locations 1-5 relate to the measured Day LAeq (1hour) road traffic noise levels presented in Table 7.1, as the levels differ.

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5. Aboriginal Cultural Heritage		
5A	There are significant errors in the Aboriginal archaeological assessment.	<p>Incorrectly states that ethnographic recordings are not available for the Bomaderry Creek Area. OEH has recorded such information in a cultural mapping places project in 2005. This should be included.</p> <p>Aboriginal Land Claim not mentioned: I note the parcel of land directly opposite Pitt Street is the subject of an Aboriginal Land Claim. The road route favoured by Council – the Central Option proposes to cross directly through this parcel. In the submitted documents the consultant's report does not make mention of this violation of the Land Claim or of the Land Council plans or wishes as regards the road through the existing Regional Park. Consultation between Council and the NSW ALC in regards to the Land Claim must be demonstrated.</p> <p>Aboriginal cultural heritage impacts of Option 1 have been under-estimated due to errors in assessing item BCRP 11: Previous surveys have identified a larger number of items at BCRP11 compared to what is described and assessed in the Aboriginal Archaeological Assessment report. As such the site is larger and more significant than realised by the proponent. The greater number and variability of artifacts previously recorded at BCRP 011 would suggest the need for a reassessment of its significance and that of the other nearby sites.</p>
5B	Option 1 and 2 will have the greatest impact on Aboriginal Heritage	<p>The central option will significantly impact the aboriginal heritage of the park. The Aboriginal Heritage tends to be ignored and will be jeopardised. These types of places are continually being destroyed and soon there will be nothing left.</p> <p>The report has incorrectly mapped the route for the West Cambewarra Rd option, which has subsequently been modified and therefore results in an over-estimate of the Aboriginal Heritage impacts of Option 3. Option 3 would be more culturally sensitive as the route impacts less on aboriginal archaeological values.</p>
5C	Option 2 and 3 will have a greater impact on Aboriginal Heritage	Aboriginal archaeological sites along Option 1 are rated of low significance compared to Option3.
5D	Aboriginal assessment, including level of consultation with the Aboriginal Community, is inadequate.	<p>The Aboriginal assessment is not consistent with the DGRs. Evidence of which groups were contacted should be provided – in particular the Shoalhaven Elders and Friends Group.</p> <p>No conclusions of the significance of Aboriginal heritage items should be drawn until appropriate Aboriginal people have been consulted. Reference is made to one Aboriginal person being consulted in 2009. This is clearly an inadequate level of Aboriginal consultation for such a significant proposal. This minimal level of consultation is not acceptable, especially when Aboriginal people can demonstrate continuous use of this area and there are organizations and individuals in Nowra and surrounds who are appropriately authorised to provide advice.</p> <p>Impacts to the Reconciliation Wall have not been considered.</p>

Table 1 – Other Issues Summary and Responses

TAG	Issue Summary	Detailed Issue Description
6. Other		
Inadequacy of Assessment		
6A	The EAR is inadequate due to lack of design and not assessing construction issues.	<p>Since temporary construction impacts can constitute major impacts on the environment, how can there be any meaningful understanding of the implications of the project and development of mitigating measures for consideration by the community if there is to be no detailed assessment?</p> <p>Equally, if there has only been a limited amount of design development how can the proponent carry out a meaningful assessment of the direct and indirect impacts of the proposal?</p> <p>Proposed route descriptions are too vague.</p>
6B	EIA not impartial	<p>The three NNLR options have not been considered impartially and there is a preference towards supporting the Council's preferred option. Council has shown little interest in impartially explaining the issues involved and encouraging residents to provide an input.</p>
6C	Ranking System too simple.	<p>The final rankings for the three route options use a numerical matrix to ascribe risks and benefits associated with the proposal across environmental, socio-economic, heritage, traffic and visual aspects. This simple numerical ranking does not account for the complexities and scale of potential impacts on biodiversity for very rare endangered species such as Bomaderry Zieria relative to (for example) a time saving for traffic, or a noise impact on a local resident. The scoring system is too limited to allow sensitivity in the outcomes.</p> <p>Such numerical rankings across vastly different aspects and impacts of the proposal oversimplify the process of arriving at a preferred route option.</p> <p>The indirect impact on existing residential areas for Option 3 is too high (the setback would reduce this impact), and the amenity impact on the gorge is under rated. Changing these 2 scores accordingly would better reflect the comparison of the Central and Northern Routes.</p>
6D	Community consultation inadequate	<p>Shoalhaven City Council has not conducted any community consultation regarding this specific proposal. The consultations to date do not constitute formal and impartial consultation, based on presentation of all the facts and figures to the community. The proponents should be facilitating genuine community consultation on all the options</p> <p>Consultation carried out in response to the 2009 DGRs was not detailed enough, not adequately focused, was totally lacking with regard to the general community and community groups and thus ineffective. No attempt has been made to justify this overall inappropriate level of community consultation.</p> <p>This inadequate treatment of this basic requirement of the principles laid down in the EP&A Act with regard to community consultation is further demonstrated by the lack of attention to the many requirements and expectations detailed in the DoP's 2007 Guidelines for Major Project Community Consultation. The proponent has failed to comply with the DGRs with regards to its Consultation requirements.</p> <p>Residents were not adequately consulted.</p> <p>No maps were provided to the residents during the consultation process.</p> <p>The lack of detailed diagrams, plans, technical details and environmental</p>

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		<p>descriptions is disappointing and results in a poor assessment outcome.</p> <p>Express its concern at the relatively short exhibition period allowed for such a complex and detailed series of documents.</p> <p>Difficulty accessing the planning documents online.</p> <p>With regard to the public display period, it was clearly too short a period of time for anybody to adequately deal with the very large number of documents and the complexity of them. The majority of community members would have taken one look at the documents whether on the web page or available locally as hard copy and turned away in despair. This would be due in part to their complexity, but I believe more due to the fact that the proponent failed to conduct a focussed and effective community consultation process during the almost 2-year period from May 2009 to February 2011 as required by the DGRs.</p> <p>It is my view that this EAR should not have been released until that part of the DGRs had been complied with. During the formal display period, community participation may have been improved by mounting a display at the hard copy outlets interpreting some of the more relevant details and explaining the participation process.</p>
6E	<p>The site analysis of the BCRP is inadequate it does not deal with the values of the BCRP and Bushland.</p> <p>The EAR has not adequately addressed the recreational values of the park</p>	<p>The Site Analysis seems to seek to downgrade these values by reducing the very important features of the Bushland to a brief summary, omitting some very significant features, concentrating on the Regional Park rather than the Bushland as a whole and by making unsubstantiated comments such as: <i>"...but the grounds are not well used due to being concealed and the access being located on a dead-end street."</i></p> <p>This so-called analysis follows the same line as much of the whole series of documents associated with this Concept Plan Application, and that is, it fails to look at (and as a consequence fails to analyze) the study area as a whole, i.e., as the Bomaderry Creek Bushland.</p> <p>The so-called analysis also underrates the area of the Regional Park within the Bushland and overrates the importance of the area of Council land therein. The Park constitutes about one third of the Bushland, the Council owned land also constitutes about one third and the remaining one third is taken up mostly with Crown land and a small percentage of freehold.</p> <p>Full details of the amenities in the BCRP need to be provided including: an attractive entrance and parking area, a pleasant walk past regenerated bushland to a very attractive picnic area with toilet facilities (suitable for the disabled), sheltered picnic tables, a gas barbeque and interpretive signage including an outstanding reconciliation wall.</p> <p>Scenic zonings should not be considered environment protection.</p> <p>The only reference to the recreational values of the Park in the EAR is dealt with in a summary fashion which is quite inadequate given the clear impact of the road being constructed within a few metres of the entrance to a picnic area and the cutting off of a track specifically developed for the disabled.</p>
6F	Errors in the Biodiversity Assessment	<ul style="list-style-type: none"> ■ Incorrect mapping of Spotted Gum – Turpentine Tall Forest as Spotted Gum Blackbutt Forest ■ Figure 16 is inaccurate.
Potential Future Development		

TAG	Issue Summary	Detailed Issue Description
6G	The construction of the NNLR will potentially lead to future development within the bushland.	<p>Due to proposed development of the road and increased motor traffic there is potential for the bushland to be developed for residential purposes.</p> <p>The NNLR will give the green light for significantly more development.</p>
Other Environmental Issues		
6H	Increased risk of soil disturbance, erosion and pollution of the BC are substantial.	<p>Increased risks of soil disturbance, erosion and pollution of the BC are substantial.</p> <p>For the construction period these impacts include over-clearing through poor delineation of the site and overall disturbance, degradation and compaction of the soil due to stockpiling, erosion through loss of vegetation and breaking up of the sandstone for construction, contamination of Bomaderry Creek by petrol spillage and concrete waste, introduction of weeds, exposure of leachate from former land fill on the Southern route.</p> <p>The Southern Route would involve impacts within the riparian corridor, due to the width of the Gorge at this location and the need to construct footings and piers for the bridge.</p> <p>The activities and impacts represent high level risks and potential irreversible impacts to Park and Bushland biodiversity and integrity and to water quality and to the riparian areas of Bomaderry Creek and its gorge.</p> <p>There seems to be limited mention of any plans to address soil erosion along the routes. Such statements do not inspire confidence that the prevention and mitigation measures have been thought through and that they would in fact prevent and minimise these potentially high impacts. Water pollution control technology is simply not capable of replicating natural runoff quality from native vegetation. There is no way of preventing pollution of Bomaderry Creek and the Park and Bushland environment from the construction and operation of a major road. All that gross pollution control traps would do is collect trash and solids that would have to be periodically cleaned out and taken away. Who would have responsibility to do this?</p> <p>Any NNLR should be consistent with the <i>NSW Groundwater Dependent Ecosystems Policy</i>, and should maintain natural patterns of groundwater flow and not disrupt groundwater levels that are critical to Groundwater Dependent Ecosystems.</p>
6I	Option 3 route is prone to flooding	<p>Option 3 is flood prone and therefore not a good option.</p> <p>Option 3 would require road approaches and the bridge to be constructed at a high level due to the periodic flooding at Bomaderry Creek and the end of West Cambewarra Rd.</p> <p>Other options are less prone to flooding or floodway restrictions</p>
Revocation		
6J	Revocation of land is unacceptable	<p>The State Government policy relating to such revocations requires the matter to be one of exceptional circumstances and where no suitable alternative sites are available outside NPWS land. The policy goes further by giving an example of such exceptional circumstances, eg, "... a major highway routing or upgrade". 'Where is it established in this application that such exceptional circumstances exist?</p> <p>Once an area is protected the community expects that it would be removed from any future development consideration except in exceptional</p>

TAG	Issue Summary	Detailed Issue Description
		circumstances. In this case there is a viable alternative.
Other Issues		
6L	Approvals more complicated for Central and Southern Options	<p>Approvals more complicated for Central and Southern Options – resulting in increased uncertainty and more project risk in terms of viability.</p> <p>The northern option would not affect any commonwealth species and so would not require Commonwealth approval.</p> <p>In the interests of reducing the time frame for the approval of this project and ensuring that the project will actually go ahead, it is an important matter that this route is the only one under consideration that will not require the matter to be referred to the Australian Government for approval under the Environmental Protection and Biodiversity Conservation Act.</p>
6M	Financial and resourcing impacts.	<p>Increased animal vehicle collision will impact on the resources and costs of animal welfare and wildlife rescue and recovery organisations.</p> <p>Loss of landcare/bushcare resources, and in-kind community resources for management of offset areas if it were transferred to OEH.</p> <p>The proponent should indicate whether it proposes to fund contribute to future management of the offset area.</p>
6N	Councillor Interference	The preferred option being pushed by council is a result of Councillors being concerned about the value of their homes.