Julian Watson
Director Princes Highway Upgrade Program
Transport for NSW
PO Box 477
Wollongong NSW 2500

13 June 2022

Dear Mr Watson

Submission on the Moruya bypass corridor options

The Moruya Bypass Action Group represents diverse members of the Moruya community who have come together because they are concerned about the processes involved in the selection of the Moruya bypass corridor, the transparency of these processes, plus the impacts of the bypass on productive agricultural land, properties, local businesses, the environment, as well as the visual amenity and social fabric of our town.

In June last year, we provided detailed feedback on the *Moruya Bypass Strategic Options report*, as well as the community consultation process associated with the release of this report. We also commented on the first round of community consultation, which occurred during an extraordinarily difficult time in April/May of 2020 and excluded a large proportion of the community because it was entirely on-line.

We have now reviewed the *Strategic Corridor Workshops report*, released in April this year, as well as the technical reports on the Transport for NSW Moruya bypass webpage, and participated in all aspects of the most recent round of community consultation seeking feedback on the short-listed bypass corridor options.

Attached is our response to this consultation and the information provided which raised the following key concerns:

 the consultation relied heavily on an ability to interact on-line which does not take into consideration the limitations of our aged population

- the technical reports are beyond the understanding of most people in the community and should have included summaries to make them more accessible to the general public
- consultants who were at the technical information workshops were unable to answer questions about their own reports which were very preliminary and did not contain important detail that will only be provided at a later stage when the bypass corridor has been chosen
- there was no means for recording feedback provided in person at markets and workshops
- the technical reports do not reflect the modifications to the various corridor options made over the course of last year, as a result the analyses are outdated
- the analyses in the information provided do not accurately reflect the integration of the bypass options with the new regional hospital and emergency centre
- none of the material provided acknowledges the huge impacts of the 2019/20 bushfires and subsequent pandemic on the environment and people of our region. These events have changed important landscape elements such as vegetation cover, flood patterns and habitat availability and impacted on agricultural productivity and social cohesion

We question the size of the public investment required to build the Moruya bypass since it is likely that only 23% of the traffic will utilise it. It seems that we are getting a north coast infrastructure solution for a south coast problem which is not of the same magnitude. People live in this area because of its beautiful rural setting and natural environment and this attracts visitors for the same reason. We believe that there must be a more cost-effective solutions to our traffic flow problem that do not impact so greatly on the people, environment and amenity of our town.

Yours sincerely

Julie Morgan

On behalf of the Moruya Bypass Action Group

Community consultation

The 3rd round of community consultation was more comprehensive than either of the previous 2 rounds. The community was notified about the consultation by postcard or, if they had registered with Transport for NSW, on-line just before the Easter break and during a Federal election campaign, so it was easily overlooked by many people.

Face-to-face opportunities to talk to Transport for NSW were provided through market stalls, information sessions and membership of a flood focus group which were advertised on-line. The market stalls focussed on Moruya where there were 4, with the late addition of 1 in the Bateman's Bay area following feedback from us about the importance of including communities north of Moruya. These stalls displayed 2 maps of the 3 corridor options, but no other information. Passers-by had to engage with Transport for NSW staff to find out further detail about the maps and although this generated discussion, there was no provision to capture any feedback.

A series of 3 information sessions (transport/noise, biodiversity/landscape, flooding) were held at a venue on the edge of town that is generally not used for community meetings. This, together with the need to register on-line to attend, then sign up and log in to Eventbrite and access a ticket, meant that these sessions were very poorly attended, so there were mostly more Transport for NSW staff present than community members. The technical information provided at these sessions lacked important detail which will only be provided at the design stage and while there were opportunities to ask questions there were no formal mechanisms to provide feedback, so it is not clear just how much of the discussion at these sessions was captured. Some of the technical reports discussed at these information sessions were not provided to the community, including the traffic and landscape reports. Others were outdated, being based on route options that have now been altered and extended.

Community members had the opportunity to be part of a Flood Focus Group and attend a series of 4 workshops on flooding. The application process was quite onerous, involving a detailed expression of interest plus 2 referees, and the workshops required a big commitment in terms of time, however more than the maximum 12 community members applied. Flood history and modelling was presented to the participants, but it became clear during these workshops that substantial on-ground work was still required to more accurately determine the impact of the various bypass options on the Moruya floodplain. The Flood Focus

Group workshops are ongoing beyond the cut off date for feedback on the bypass options, but it is unclear how the community input provided will be used to inform selection of the preferred bypass route.

Feedback was also sought via online surveys and an interactive map of the various bypass routes, but these did not allow for comprehensive feedback. This on-line component of the consultation process excluded many older people and those who are not technologically literate or who do not have suitable internet access, which is a significant proportion of the community in our region. We received reports of people having difficulty accessing and commenting on the interactive map and many were confused about the town survey which was not about providing feedback on the bypass options, but about visitation patterns in Moruya. Although a telephone number was provided on the initial postcard for the consultation process, a postal address was only provided on the Moruya bypass webpage.

Despite a consultation period of over 2 months, there was no real attempt to reach out to those sectors of the community who are not technologically savvy or who live outside of Moruya and will be impacted by the bypass route. During the consultation period, the Moruya Bypass Action Group attended community events and presented to community groups in our region who were still unaware of the bypass options, let alone the consultation process. Consequently, we have promoted the consultation process on our website, in person at stalls, on flyers and through an email list of over 500 residents who signed our petition.

We are still waiting for the report from the second round of community consultation in May 2021. However, it seems that the barriers to more comprehensive engagement with the community, which we raised in our submission, have not been acknowledged.

Assessment of the corridor options

In our comments on the *Moruya Bypass Strategic Options* report in May 2021, we noted that several workshops were held to consider the various route options for the bypass and to recommend a preferred corridor option. We requested that the reports that came out of these workshops be provided to the community so that they could see who was representing their interests and understand how the short-listed options were chosen, since there were inconsistencies in the scoring of the various options against project values and the methodology for ranking the options was dubious. A

short *Strategic Options Process Frequently Asked Questions* document was released in June 2021 to address our concerns, but as we noted in our submission later that month, it described the Values Management Workshop process but did not offer any detail about the information provided to participants or how the short-listed options were justified.

Transport for NSW released the *Strategic Corridor Workshops Report* in April this year. This 88 page document is only available on-line and it is unlikely that many people have read it. It comprises a chronological summary of the various workshops undertaken to shortlist the bypass corridors and select the preferred corridor. However, it is still light on detail and does not provide important information requested by the community, such as cost estimates and the nature of the technical assessments that produced the initial 11 corridors or the 5 short-listed options. It does not address the inconsistencies in the rankings of the various options which we raised in our submission and is based on outdated routes, such as the Orange option which has been extended substantially at both ends so it no longer starts at the Moruya industrial estate and finishes at Noad's Drive and the Purple option, which was originally Option E in the Strategic Options report and started at Larry's Mountain Road, but now starts north of the Moruya industrial estate.

The values (Safety, Resilience, Liveability, Sustainability, Accessibility and Connectivity) assessed as part of the multi-criteria analysis undertaken at the Values Management Workshop are hugely open-ended and the performance of the various short-listed options against these values is highly questionable. For example, how does the Orange route address sustainability criteria (decarbonisation, minimal impacts to endangered vegetation and the marine environment) or accessibility/connectivity criteria (seamless connection to the airport and industrial estate or improved access to the new regional hospital from Bateman's Bay or emergency access to Larry's Mountain Road during bushfires)? Similarly, the performance of the Orange versus the Purple option for liveability and resilience is not based on anything tangible in relation to supporting a modal shift to active and public transport, landscape character and visual, as well as, township amenity. The Orange route scores well on land use integration because it apparently allows for town expansion to the east, which presumes that Council will rezone rural land to the west of this route for residential development, contrary to their strategic planning commitments.

There are statements in the *Strategic Corridor Workshops Report* which are patently incorrect such as: the Orange route has a low bushfire risk and maintains good connections to Moruya, the industrial estate and the new regional hospital, or misleading: the Orange route minimises impacts to the bushland areas in the east, without mentioning the impacts on bushland areas to the north around Percy Davis/Malabar Drives and south adjacent to Noad's Drive. The Purple option scores poorly on land use integration because it supposedly cuts the town in half and limits future expansion as well as financial sustainability because it 'bisects' Riverside Park. However, these statements are arguable from a number of perspectives, as are statements that the business impacts of the bypass will be short term. The Yellow option scores for liveability, resilience and sustainability relative to the Purple option are also inexplicable. Other stated objectives for the bypass are improbable such as the safety objectives which talk about improving safety for fauna such as Koalas (which haven't been sighted in the area for decades) and avoiding an increase in crashes across other parts of the road network.

An appendix at the end of the *Strategic Corridor Workshops Report* lists 4 'community' stakeholders present at the Values Management Workshop. Three of these were council staff who do not live in Moruya and the other is a member of the Moruya Business Chamber, who does not live or operate a business in Moruya. Transport for NSW provided a summary of initial community feedback on the bypass to the workshop participants, but given the flawed nature of the first round of community consultation this feedback is hardly likely to have represented the views of the broader community. There were no community representatives at any of the other workshops and Council denies any involvement in the selection process for the bypass.

A number of internal workshops were subsequently held to review the outcomes of the Values Management Workshop. The first of these reviewed the risks that required further investigation prior to recommending a preferred route. It looked at how costs could be reduced and the environmental approval pathway for each option, recognising that there were a lot of underlying assumptions involved and that more needed to be understood about flooding. A review of project cost drivers (length of bridge structure, earthworks) showed that floodplain options and remote routes were more expensive. However, all of the costs in the report were redacted, so we have no idea how the options compared. Following a value engineering review to see if the

performance of the options could be improved against project costs, the participants short-listed the Purple, Orange and Yellow options.

Prior to selecting a preferred corridor option, risk reviews of the short-listed options were undertaken. A design and flooding risk review showed that higher flood velocities closer to town were an issue for the Purple and Orange options and because the Orange option is aligned parallel to the flood flow, scouring and damage to the bridge piers were likely. Both the Purple and Orange options require long, flat land bridges which creates drainage issues from the deck, while the Yellow option is higher at the northern end which would assist drainage, but there are risks associated with earth works. Approval pathway risks were also considered, but not explained in the report except to say the Yellow option had the highest risk because it required an Environmental Impact Statement. It is not clear why the Orange option only requires a Review of Environmental Factors, given the likely impacts it will have on at least 5 endangered ecological communities and the floodplain. A value for money review was also performed but the table listing the base cost factor, economic benefits and per lane/km benchmark for each option was not supported by any data to explain how these measures were arrived at. It recommended the Yellow option because it supposedly provides: the lowest travel time for users, easy access to the new hospital, lower flood risk during construction, the highest amenity because it is the furthest from town, the lowest cost and highest economic benefit.

A corridor review workshop then considered the outcomes of the risk reviews, as well as strategic requirements (high risk areas, future proofing, visual impacts, connectivity, safety, efficient utilisation, environmental impacts, constructability and maintenance issues) to refine aspects of the short-listed options (tie-ins, horizontal and vertical alignments etc). Additional work was then undertaken: flood studies, geotechnical drilling, Aboriginal heritage and vegetation surveys as well as economic analysis, traffic modelling, cost estimates for high risk areas, potential planning pathways and an assessment of environmental risks. Refinements were made to the short-listed corridor options and 3 new options were considered: minimum refinements to the existing traffic flow around and through Moruya; a Grey option which starts at Larry's Mountain Road and crosses the river at John St; and a Pink option which resembles Option E, the original Purple option, and starts at Larry's Mountain Road. This was followed by a preferred corridor selection workshop which compared the project costs and cost drivers for each option, but could not reach consensus on a preferred option. The project team recommended the Yellow option

because it was the cheapest, but it had the highest environmental impacts and planning approval risks. However, the Pink/Purple Option was favoured due to potential opportunities to present a hybrid of options. A final decision was made based on all of the workshops, risk assessments, technical investigations, minimal community input and Ministerial approval. The Orange option was selected because it supposedly outperformed all other options and the associated risks were considered to be able to be planned for and mitigated through the design process.

The benefits described for the Orange corridor are debatable, especially given that the route has now changed, and despite the additional information provided in the *Strategic Corridor Workshops Report* it is obvious that the selection process was far from clear cut or transparent. The Orange option will not provide direct access to the new hospital and passes through areas of high bushfire risk. It is hard to envisage how a bypass that is 2.5kms east of town will help the people of Moruya during a bushfire or flood emergency. The community has had little opportunity to provide input at any stage of this selection process and, as noted in our earlier submission, they have been asked to provide feedback without fully understanding the scale and detail of the project.

Technical information

Five technical reports were posted on the Transport for NSW website during the consultation period: *Strategic Options Noise Assessment, Existing Flood Behaviour and Sensitivity Analysis, Flood Study Options Assessment and Impacts; Biodiversity Survey* and a *Preliminary Environment Investigation*. They were only available on-line and were undertaken early on in the bypass option evaluation process using corridor routes which, in terms of the Orange option, are now outdated. They largely comprised desktop analyses which were used to model potential impacts and were released without any summaries which would have made them more accessible to the community. Only the *Biodiversity Survey* report was supported by some initial field work.

There were also 3 technical information sessions during the consultation period: Traffic and Noise, Biodiversity and Landscape, and Flooding. There were many questions at these sessions about the detail surrounding the information provided. A number of these questions could not be answered by the consultants who prepared the reports. We were asked to put our questions in writing and they would be answered, but we pointed out that we were still waiting for answers to questions we

asked in 2021. The response to other questions was that Transport for NSW was at the strategic planning stage and that more detail would come later at the design stage, once the preferred route had been decided. This will be too late for the community who have to live with the outcomes of the selection process.

Traffic

There was minimal information provided about the traffic impacts of the bypass. The crash statistics used to justify the need for a bypass were based on an area from Broulee Rd down to Donnelly's Rd, east to the coast and west to the edge of the Moruya township. This covers a number of roads including George Bass Drive, North and South Head Roads and Larry's Mountain Road. However, only half of these crashes occurred within the section of the highway that will be bypassed. Traffic predictions were based on traffic data collected during the peak holiday period at Christmas, when traffic is at a maximum. This is not representative of the usual traffic flow through town. From the documents provided and discussions with Transport for NSW, we understand that only 11% of the traffic using the stretch of highway through Moruya comprises heavy vehicles and only 23% of the traffic actually bypasses the town, which begs the question, why is the Moruya bypass a priority project? This information session raised more questions than it answered.

Noise

The Arup Strategic Options Noise Assessment is based on modelled data and provides only preliminary predicted noise levels for the various corridor options based on the initial corridor routes. It involved no ground-truthing and used a number of broad assumptions which may not hold for the final corridor design. It is also based on traffic predictions derived from the traffic monitoring data collected during peak (Christmas) usage times and does not take into account the fact that much of the bypass is likely be a raised land bridge over the river flats, which means it underestimates the noise impacts for all receivers. Details such as the number of lanes, speed limit, location/type of tie-ins and the road surface, all of which are critical for predicting noise impacts, are not yet known. As we pointed out in our previous submission, an elevated concrete bypass with 4 lanes of traffic and a speed limit of 100kph will result in a road that is significantly noisier than an equivalent 2 lane bitumen road at ground level with a lower speed limit. Similarly, the report does not consider feasible or reasonable noise mitigation measures in any detail because these are expected to be addressed at the design stage. A full noise assessment will only be conducted at the planning approval stage of the bypass, which is too late for

the affected community. Interestingly, the report notes that the Purple option may marginally increase noise levels for receivers in town, but the relative increase is lowest for this option because this bypass route is the nearest to the existing road network, something that we have been raising in relation to the amenity impacts of the Purple option.

Landscape

At this information session, Transport for NSW talked about how they would fit what is essentially a big piece of infrastructure into a sensitive landscape. They talked about broad 'character zones' which they mapped as rural, forested, urban and residential zones. However, it was pointed out that these zones did not reflect what was present on the ground and that if the town was to expand to the east, as Transport for NSW have predicted will happen, their character zones would no longer be relevant. We were then shown visualisations of the land bridge on Mullenderee flats, Mynora flats and Riverside Park, something we had asked for in our earlier submission, as well as the bridge structure for the Yellow option. However, all of these visualisations were long shots and the bypass was so far in the distance it was barely visible. In addition, the bridge for the Yellow option appeared to be in the wrong location. There was discussion about adjusting the bypass alignment to make it 'fit the landscape', but the degree to which this can be done was questioned given the engineering constraints of building a long land bridge and the nature of the landscape through which the bypass will travel. As stated in our previous submission, any of the corridor options that involve an elevated bypass across the Moruya River and its floodplain will have a negative visual impact on the river and its surrounding landscapes. The agricultural setting of the township with its natural vistas will be dramatically altered forever. We were told yet again that landscape, heritage and environment would be balanced at the design phase, but that will be too late for the people of Moruya.

Biodiversity

The size (96Mb) and technical complexity (Biobanking Assessment methodology) of the *Biodiversity Survey report* made it difficult, if not impossible, for most people to access or understand it. It does not include an impact assessment, which will only be undertaken at the planning approval stage for the preferred option. While the study area incorporated all 3 short-listed options, the bypass routes were earlier versions of what is now being proposed and the focus of detailed survey effort was on the Orange route only because it was the preferred option at the time (2021). The report

notes that there were property access issues along the Orange route in areas which are likely to support high biodiversity values resulting in information gaps that require further survey effort. Despite this, we were told at the information session that the Yellow route would have the highest impact on biodiversity followed by the Purple and then the Orange routes. This is difficult to accept since the Orange option is much longer than the Purple option and passes through large areas of at least 5 endangered or critically endangered vegetation communities compared to the Purple option which passes through small patches of 3 endangered communities. What is clear however is that all 3 bypass options will have an impact on areas of high conservation value including protected wetlands and endangered vegetation which provides important habitat for threatened species. The Orange and Yellow options, in particular, will bisect large vegetation remnants and disrupt connectivity across the landscape which is important for the movement and long-term viability of local wildlife that were severely impacted by the recent bushfires. As stated in our submission on last year's Moruya Bypass Strategic Options Report, the 2019-20 bushfires placed immense pressure on wildlife and habitat on the south coast, so every effort must be made to protect remaining unburnt habitat and reduce pressures on threatened species. There has been no acknowledgement of this event or its impacts in any of the environmental reports we have seen.

Flooding

Transport for NSW posted 2 flood reports on their website: an Existing Flood Behaviour and Sensitivity Analysis which summarises existing flood characteristics of the Moruya River based on historical information, relevant guidelines and previous investigations and a Flood Study Options Assessment and Impacts which builds on the first report. Neither report recognised the likely impact of the 2019/20 bushfires on flood behaviour due to the extensive loss of vegetative cover across the region. Flood records in Moruya date back to the 1880's with the largest flood recorded in 1925 (>1% AEP) and a further 7 floods in excess of the 5% AEP prior to 1940. Since then, no floods have exceeded this level and over the last 30 years, none have exceeded the 20% AEP. Flood levels have been traditionally measured at the Moruya bridge, which has been replaced 4 times, so that levels observed in the past may not be the same as the equivalent levels at the current bridge. The actual level of flooding depends on tidal and entrance conditions at the Heads, which are changeable. Flood modelling was undertaken for a range of flood events from 5% AEP through to a Probable Maximum Flood, using historical records and taking into account climate change predictions to understand flood behaviour across the Moruya

floodplain. Modelling was also used to understand the likely changes in flood behaviour caused by the various bypass options and to estimate the total length of land bridge required for each option to minimise increases in peak flooding due to that option. Longer land bridges will be required for those options that pass through larger areas of the floodplain, making them more costly. The piers on these land bridges will also obstruct fast flowing floodwaters, so their number and placement will be important. All 3 short-listed options will have impacts on local flooding in Moruya, which will need to be addressed during the design phase for the bypass, but cannot be completely mitigated. So, while the bypass will improve flood 'immunity' for the Princes Highway, which can remain open for through traffic, it is likely to make things worse for local flooding.

Selecting a preferred bypass option

In our previous submission, we asked the Moruya Bypass project team to rethink the timing of this project and take the opportunity to comprehensively and transparently review the short-listed options in the Strategic Corridor Options Report on the basis of more detailed comparative assessments undertaken for each option. We also requested that this information be provided to the community so they can make a more informed choice about which option is best for our town.

During this third round of consultation, the community was provided with additional information about the workshops undertaken to assess and select the 3 short-listed options, as well as some of the technical reports that were produced to assist that selection process. We have also had the opportunity to attend technical information sessions and ask questions about the detail around the selection process and some of the technical issues. This is an improvement on the 2 earlier consultation sessions, but far from the comprehensive and inclusive approach required for genuine community consultation. It was heavily skewed to on-line feedback, which does not suit a large proportion of our population and does not allow for detailed responses. Where there were opportunities for face-to-face feedback, there were unnecessary barriers to participating, such as the need to register on-line, and no formal method for capturing the feedback from those few community members who made the effort to participate. The Flood Focus Group workshops had the most success in engaging the community, attracting a reasonable number of participants despite the effort required to apply and attend.

The technical studies provided were based on the original corridor options and do not reflect recent significant changes to the configuration and extent of these options. They were also very preliminary and stipulated that further work is required to provide more meaningful comparisons between the different options. However, this further work will only occur during subsequent design and planning approval stages for the bypass, once a preferred corridor has been selected. Similarly, while lots of questions were asked at the technical information sessions, they were often met with a standard response that the project was at the strategic planning stage and the detail that was being asked for was yet to be decided. How can the community provide feedback on a preferred bypass option now when they do not have all the information they need to make a decision?

Despite this third round of consultation, there are many important issues which we raised in our previous submission that have not been addressed. These include the likely direct and indirect impacts of the various bypass options on properties or dwellings, as well as productive farmland. It appears to us that the Orange option will have the greatest impact because it crosses the longest stretch of floodplain, as well as rural properties to the north and south of the floodplain. As noted in our submission, the shorter Purple option is likely to have the least impact because it crosses the smallest stretch of floodplain and most of the properties adjacent to this corridor are already indirectly impacted by noise from the highway which existed prior to them being built.

The outcomes of cultural heritage and geotechnical investigations have not been provided, but we believe that hydraulic drilling has shown that bedrock is over 25m, and up to 45m, below the surface of the Moruya floodplain which has serious implications for the construction of large land bridges. We have previously asked about the estimated dimensions of the construction footprint and the nature of associated earthworks for the Orange option because we are concerned about the very real potential for exposing Acid Sulfate Soils which lie very close to the surface on the river flats. This will cause serious harm to the agricultural lands along the bypass route as well as adjacent waterways that flow into the Bateman's Marine Park

What impact will the Orange and Yellow bypass options, which are over 2.5kms from town, have on Moruya's retail businesses which rely on passing traffic outside peak holiday times? The *Strategic Corridor Workshops Report* dismisses these impacts

as being short term with long term positive outcomes. However, our survey of business owners tells us that these options are too far from town, which will not be visible from either bypass. They feel that the Purple option, which is closer to town, will be better for business. Some businesses have even said they do not want a bypass at all, but would prefer to see less costly solutions to the local traffic flow problem.

Related to this, is the issue of connectivity of the Orange and Yellow bypass routes to the new regional hospital, the town and Moruya airport given that we understand there will be no on/off ramps for either option. The *Strategic Corridor Workshops Report* states that the Orange option will provide a 'seamless' connection to the airport, improved access to the new hospital from the north and good connectivity to the Moruya industrial estate, but this is misleading as neither of these options will achieve this. The Purple bypass is the only one to provide direct access to the new hospital, existing access to the industrial estate and convenient access to town. The assertion in the report that it 'bisects' the town is incorrect because it goes along the eastern edge of the town through land which cannot be developed because it is largely low-lying.

Another issue that concerns the community is the effect of the various bypass options on the use of the Moruya River for aerial firefighting because this will impact on the resilience of the town during bushfires. The Purple option is closest to town and provides more options for planes to access long, deep sections of the river to refill their tanks. The other two options restrict access to sections of the river that are likely to be suitable for planes to safely refill.

In our previous submission, we said that if Moruya needs a bypass, then the shorter, less destructive it is the better. This led us to support Option E in the *Moruya Bypass Strategic Options* report, which started at Larry's Mountain Road and crossed the river at Main Street to connect up with William Street and re-join the highway east of Moruya TAFE. This was subsequently extended north to the industrial estate and became the Purple option. However, as far as we know, there has never been a business case to justify the need for a bypass of Moruya and we have not been provided with any cost-benefit analyses or cost estimates associated with the 3 bypass options. Instead, a values assessment of the major benefits of the options was used to justify the selection of a preferred corridor. This values assessment

focussed on bypass users and not local road users or the Moruya community. Given that we now know only 23% of highway traffic actually bypasses the town and 11% of the traffic is heavy vehicles, we wonder whether a huge and costly land bridge is really the solution we need to minor traffic flow issues in Moruya, which are largely confined to Christmas and Easter. If flood 'immunity' for through traffic is the driver for the bypass, then what impacts will this have on local flooding and access to the bypass from town? It seems to us that there are likely to be better, more cost-effective solutions to this that do not impact so greatly on the people, environment and amenity of our town. The money saved can then be put towards improving the condition and safety of the existing highway and medical services for our new regional hospital which will save more lives at a quarter of the predicted cost of the bypass.