

Responses to submissions on the Yelgun Rest Area (last printed 3-Feb-05)

Sub No	Issue No	Last Name	Issue	Sub-Issue	Description	Response
5915	5	New Brighton Progress Assoc Inc	Need	Sleepy Hollow	Suggests that existing rest area at Sleepy Hollow is better suited because of direct access and a location removed from a large residential area.	<p>The Sleepy Hollow light and heavy vehicle rest area provides facilities on each side of the Yelgun to Chinderah Freeway. There are several unshielded rural residences in the area surrounding it. It can only accommodate five heavy vehicles on each side of the Freeway and surveys show that it is well-used, sometimes to capacity. The RTA cannot practically expand parking to accommodate more vehicles within the existing RTA-owned road reserve.</p> <p>In addition, the presence of heavy vehicles at the Sleepy Hollow rest area has created detrimental noise impacts for adjoining residences. The Northern Pacific Highway Noise Taskforce Report, prepared by the Taskforce (which included local, industry and government representatives) in August 2003, reviewed existing and potential noise issues. Section 4.15 of the Report notes that the location of truck rest areas near noise sensitive receivers is a contributing factor to increasing road traffic noise along the Pacific Highway. Heavy vehicles decelerating on approach and entry to a rest area, and then accelerating as they leave, particularly at night, are a significant concern for residents at, among other locations, Sleepy Hollow. The Report presents long term strategies for action by 2008. For the Yelgun to Chinderah Freeway, one of the long term strategies is to review the siting of the heavy vehicle rest area at Sleepy Hollow to resolve existing noise disturbance.</p> <p>As recommended by the Northern Pacific Highway Noise Taskforce Report, the RTA proposes to remove heavy vehicles from the Sleepy Hollow rest area to reduce noise impacts on adjoining residences. Once heavy vehicles are removed, the RTA would need to provide a heavy vehicle rest area within 35 to 50 km of the Queensland border, in accordance with its strategies for locating rest areas on the Pacific Highway. The proposed facility for light and heavy vehicles at Yelgun would satisfy the need for a heavy vehicle rest area once Sleepy Hollow is closed to heavy vehicles. It would also be located in a position that is removed from nearby residents and minimise the extent of noise impacts. The site for the proposed facility has been selected, in part, because it is well-shielded by landform, and is isolated from nearby residences. This would reduce potential adverse noise impacts. The REF considers road traffic noise impacts, including heavy vehicles decelerating and accelerating while entering and leaving the proposed rest area, and recommends safeguards to mitigate noise exceedance.</p>
5915	6	New Brighton Progress Assoc Inc	Design	location	Suggests that existing rest area at Tyagarah is better suited because of direct access and a location removed from a large residential area.	<p>When the Sleepy Hollow rest area is closed to heavy vehicles, a heavy vehicle rest area should be provided within 50 km, and preferably 35 km, of the Queensland border. Several submissions suggest that the RTA use the areas either side of the Pac Hwy at Tyagarah. However, this location is too far south to satisfy the location criterion in the Pacific Highway/F3 Freeway Rest Area Strategy. In addition, the site does not provide sufficient area to accommodate heavy vehicle parking areas, and it would be less efficient than the proposed facility at Yelgun because rest area facilities, and the operational resources needed to maintain them, would be duplicated for each carriageway.</p>
5920		NATROAD	Need	safety	Supports rest area. Current shortfall of truck rest areas, particularly for B Doubles.	Noted.
5921	1	van Twest	Need	safety	The writer comments on rest areas in general.	The writer's comments are noted.

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5921	2	van Twest	Function	service station	Appears to favour a third service station with take-away food [unclear if writer believes a service centre is proposed].	The proposed facility is a rest area and would not provide commercial facilities found at service centres. Under the current zoning, food shops and service stations are prohibited at the site of the proposed facility. As noted on page 8 of the REF, the RTA does not intend to request Byron Shire Council to rezone the site to allow food shops or service stations.
5924	1	DIPNR	EIA process	adequacy	Considers that the REF adequately addresses all issues of concern.	Noted.
5927	1	Lions Club of Brunswick Mullumbimby Inc	Operation	Driver-Reviver operation	Supports rest area and will accept the RTA's invitation to operate the Driver-Reviver. Identifies issues that require further consideration including signage, safety while heavy vehicles are using local roads, provision of services to site, provision of safe area compound and play equipment, representation on planning committees, and permanent storage and servicing.	The RTA acknowledges the Club's support. During the detailed design phase, the RTA would consult with the Club to further consider these issues.
5928	1	Campbell	Need	climate change	Climate change and global warming will render the rest area useless. Trucks will contribute to global warming. Questions how RTA can ignore these issues in planning.	There is a need, and there will continue to be a need for the foreseeable future, to provide rest areas to promote safe driving behaviour. The writer's concerns reflect long term impacts of global warming. However, the present and foreseeable need for a rest area is unlikely to alter during the design life of the proposed facility.
5928	2	Campbell	Need	economic viability	Increases in the cost of fuel will make long distance road freight transport uneconomic.	The writer's concern appears speculative at this time. In any case, there is a need to provide rest areas to promote safe driving behaviour for all road users, including the freight industry, as discussed in both the Pacific Highway/F3 Freeway Rest Area Strategy and the Pacific Highway Safety Review on pages 11 to 13 of the REF.
5928	3	Campbell	BH2Y	economic viability	The cost of BH2Y should have been invested in drive-on/drive-off railway facilities or on upgrading the New England Highway.	The RTA notes the writer's comments on the approved BH2Y Upgrade. However, they are not relevant to the proposal or the REF.
5928	4	Campbell	Wastes	pollution	The rest area will be used as a service stop that will produce wastes that will compromise already pressured ecosystems.	All runoff from the rest area would be treated by the Humeceptor device that is described on page 21 of the REF. These devices typically remove up to 97% of free oil and 90% of suspended solid sediments. The RTA does not permit servicing of vehicles in its rest areas. While hydrocarbon spills may occur, they are infrequent. During the detailed design phase for the proposed facility, the RTA would investigate options to contain spills, including a downstream storage basin with a lockable outlet. If spills occurred, then the basin outlet could be locked by emergency services and any spills or pollutants could be removed from the storage basin. Such a basin would be operated and maintained by the RTA in cooperation with emergency services.

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5928	5	Campbell	Operation	noise	There will be noise pollution from refrigerated trucks.	Refrigerated trucks are expected to use the proposed facility. The noise impact assessment on pages 34 to 38 of the REF considered noise from truck refrigeration units as well as noise from trucks idling, starting, stopping and closing doors. The noise impact assessment found that noise from the rest area would meet relevant noise criteria except at the RTA-owned former Jagwen residence and Lot 4(22) Stock Route Road. It would not exceed relevant criteria at the writer's property.
5928	6	Campbell	Traffic noise	amenity	Already suffer continuous and unrelenting traffic noise that causes personal distress.	The Yelgun to Chinderah Freeway was approved by the then Minister for Planning. The approval conditions included extensive safeguards to minimise adverse environmental impacts. The Freeway was constructed in accordance with that approval, including measures to reduce noise impacts. When operational noise monitoring was undertaken and road traffic noise was found to exceed road traffic noise criteria, the RTA provided additional noise mitigation measures where they were required.
5928	7	Campbell	Traffic noise	amenity	Rest area will increase truck noise.	The writer's property is located about 975 m from the Yelgun Interchange and about 1,100 m from the rest area. The noise impact assessment showed that noise criteria would be met at all locations except Lot 4(22) Stock Route Road and the RTA-owned former Jagwen residence.
5928	8	Campbell	Design	mixing heavy and light vehicle two-way traffic at Yelgun Interchange and existing Pac Hwy.	Rest area will create conflict with opposing traffic at the entry and exit.	The RTA considers that the access to the proposed facility described in the REF is safe and workable, and is consistent with relevant RTA strategies for the provision of rest areas. The median storage lane would allow safe merging and storage for traffic entering from the north or exiting to the south, and the auxiliary lane to the Yelgun Interchange would allow safe merging onto the Yelgun Interchange. However, the RTA notes the writer's concerns regarding the mixing of traffic on the Service Road with traffic accessing the rest area. The RTA has reviewed alternative access arrangements to separate these two types of traffic and would undertake further reviews of alternative access arrangements during the detailed design phase of the proposed facility. Subject to alternative access arrangements being practical, suitable and cost effective, the RTA will modify the access to the rest area to separate traffic accessing the rest area from traffic on the Service Road.
5928	9	Campbell	Amenity	property value	The Yelgun to Chinderah Freeway has reduced [the writer's] property value and the rest area will make it unsaleable.	The site for the proposed facility was selected in part because it would be shielded from nearby residences by the intervening topography and the BH2Y Upgrade. The proposed facility is a minimum of 500 m from the nearest residence; the writer's residence is substantially farther away. The RTA cannot comment on perceived changes to the writer's property value from the Yelgun to Chinderah Freeway.
5928	10	Campbell	Amenity	safety	Increase in burglary attributed to the Yelgun to Chinderah Freeway.	While burglary is a regrettable aspect of our society, the RTA does not believe that the proposed facility would cause or induce burglary in the district. The proposed facility is not within practical walking distance of the writer's location. Burglary is an enforcement issue and should be reported to local police.
5928	11	Campbell	Process	compensation	RTA has not compensated for impacts of the Yelgun to Chinderah Freeway or made any effort to reduce adverse impacts.	The Yelgun to Chinderah Freeway was approved by the then Minister for Planning. The EIS and approval conditions include extensive safeguards to minimise adverse environmental impact. The Freeway has been constructed in accordance with that approval, including measures to reduce impacts on flora and fauna, noise and water quality. In addition, a substantial area of compensatory habitat was negotiated for flora and fauna impacts that could not be mitigated within the Yelgun to Chinderah Freeway.

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5928	12	Campbell	Need	alternative design	Rest area should be located between Tamworth and Armidale, not at Yelgun.	As noted on pages 11 to 13 of the REF, both the Pacific Highway/F3 Freeway Rest Area Strategy and the Pacific Highway Safety Review identify the need for heavy vehicle rest areas on the Pacific Highway to ensure road user safety for all drivers.
5929	1	Milham	Design	alternative design	RTA should change design to separate rest area traffic from local traffic on the existing Pac Hwy.	The RTA considers that the access to the proposed facility described in the REF is safe and workable, and is consistent with relevant RTA strategies for the provision of rest areas. The median storage lane would allow safe merging and storage for traffic entering from the north or exiting to the south, and the auxiliary lane to the Yelgun Interchange would allow safe merging onto the Yelgun Interchange. However, the RTA notes the writer's concerns regarding the mixing of traffic on the Service Road with traffic accessing the rest area. The RTA has reviewed alternative access arrangements to separate these two types of traffic and would undertake further reviews of alternative access arrangements during the detailed design phase of the proposed facility. Subject to alternative access arrangements being practical, suitable and cost effective, the RTA will modify the access to the rest area to separate traffic accessing the rest area from traffic on the Service Road.
5931	1	DEC (New South Wales Fisheries)	Water quality	SEPP 14 wetland	Potential for discharge of pollutants to SEPP 14 wetlands and Billinudgel Nature Reserve. DPI suggests that the RTA ensure that safeguards in the REF are sufficient to satisfy DEC requirements and avoid pollution of waters.	The REF identified two potential pollutants that could enter the BNR: stormwater and effluent. Pages 21 and 53 of the REF show that stormwater would be treated using a Humeceptor or similar device to remove oils, grease and suspended sediments before discharge to the existing culverts under the Pac Hwy. The use of such a device is a commonly-accepted practice for sites with large impermeable surfaces adjacent to sensitive receiving environments. The RTA would consider the need for a trash rack during the detailed design of the stormwater drainage system. The REF also shows that effluent would be treated using commercial systems that are designed in accordance with manufacturers' and local government requirements and regularly approved by local councils. During the detailed design phase for the proposed facility, the RTA would investigate options to contain spills, including a downstream storage basin with a lockable outlet. If spills occurred, then the basin outlet could be locked by emergency services and any spills or pollutants could be removed from the storage basin.
5932	1	Hannifey	Design	details	Turning area at the western end may be too narrow. Widen for B Doubles to turn more easily.	Noted. The RTA would consider this recommendation during the detailed design phase of the rest area if the proposed facility proceeds.
5932	2	Hannifey	Landscaping	details	Trees must align with truck parking spaces to cover truck cabins. If they don't, drivers will tend to park in the shade wherever it may be and the rest area may not be fully used.	Noted. The RTA would consider this recommendation during the detailed design phase of the rest area if the proposed facility proceeds.
5932	3	Hannifey	Landscaping	details	Plant trees on both the north and south side of parking areas to provide morning and afternoon shade (only shown on north side of parking area).	Noted. The RTA would consider this recommendation during the detailed design phase of the rest area if the proposed facility proceeds.

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5932	4	Hannifey	Design	facilities	Provide additional small tables and chairs under trees for shaded meals in the heavy vehicle parking area.	Noted. The RTA would consider this recommendation during the detailed design phase of the rest area if the proposed facility proceeds.
5932	5	Hannifey	Wastes	details	Provide rubbish bins at convenient intervals to reduce the possibility of littering.	Noted. As discussed on page 21 of the REF, rubbish bins would be provided in the rest area. The RTA would consider this recommendation during the detailed design phase of the rest area if the proposed facility proceeds.
5932	6	Hannifey	Design	signage	Signs directing stock and refrigerated trucks must be located at the entry.	Noted. The RTA would consider this recommendation during the detailed design phase of the rest area if the proposed facility proceeds.
5933	1	Morden	Trucking industry	influence	RTA pandering to trucking industry and making it easier for drivers to speed between more frequent rest areas.	Rest areas are for all road users, not just the trucking industry. Rest areas help reduce the incidence of fatigue for all road users. As outlined in the Pacific Highway Safety Review, the RTA is trialling many measures to reduce the number of speeding drivers, including point to point and fixed speed cameras.
5933	2	Morden	Traffic	driver behaviour	Notes trucks regularly exceed speed limits and ineffectiveness of ways to regulate driver speed.	While traffic enforcement issues are beyond the scope of the proposed facility, the Pacific Highway Safety Review recommends that the RTA and NSW Police implement measures to reduce unsafe driver behaviour, including speeding by heavy vehicles.
5934	1	DEC (EPA)	Traffic noise	community consultation	Recommends that RTA notify residents outside of 500 m radius of rest area to make them aware of the proposal and its impacts, and to provide regular work progress updates.	The RTA would notify nearby residents during construction of the rest area to make them aware of the proposed facility and to provide regular progress updates on its construction.
5934	2	DEC (EPA)	Wastes	effluent management	Notes that regular inspection and maintenance of the effluent management system is critical to ensuring that there are no adverse impacts on adjoining areas.	As described on pages 24 and 56 of the REF, the RTA would undertake regular inspection and maintenance of the effluent management system. For the first 10 years after opening, regular inspection and maintenance would be undertaken by the construction contractor.
5935	1	NSW Road Transport Assoc	Need	rest area	Supports the proposed rest area.	Noted.
5936	1	DEC (NPWS)	Flora	Davidsons Plum	Requests that the RTA discuss options to conserve these plants with the DEC.	As noted on page 43 of the REF, the RTA would liaise with DEC to discuss options for conserving the Davidsons Plum plants and juveniles during the detailed design of the rest area if the proposed facility proceeds.
5936	2	DEC (NPWS)	Fauna	Exclusion fencing	Requests that the RTA discuss the location of exclusion fencing with the DEC to ensure that suitable locations are identified.	While the location of fauna exclusion fencing was shown in the Conybeare Morrison Concept Plan and Detail in Appendix 1 of the REF, the RTA would discuss the precise field location of fencing with DEC during the detailed design of the rest area if the proposed facility proceeds.

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5936	3	DEC (NPWS)	Landscaping	plant selection	The RTA must ensure that all species used in rehabilitation are indigenous to the area. Seed must be collected from the local area.	As noted on pages 43 and 44 of the REF, the RTA would rehabilitate the site using seed collected from native species in the immediate area. It would also implement measures to control weeds during operation of the rest area.
5936	4	DEC (NPWS)	Water quality	SEPP 14 wetland	The RTA must ensure that there is no increased impact on Billinudgel Nature Reserve of SEPP 14 wetlands from operating the rest area.	As noted on pages 21, 53 and 56 of the REF, the RTA would install and maintain stormwater and effluent management systems to ensure that the rest area does not reduce water quality in Billinudgel Nature Reserve or SEPP 14 wetlands.
5937	1	Stacks the Law Firm	Need	proposed service centre at North Ocean Shores	Greenfields Mountain Pty Ltd has an approved DA for a service station and truck stop at North Ocean Shores. Considers that the rest area would be superfluous and requests that the RTA contact the company.	In accordance with RTA policies and strategies, RTA rest areas provide safe, convenient and cost-free facilities for drivers to rest and refresh. There is now a need to provide rest areas to promote safe driving behaviour for all road users as discussed in both the Pacific Highway/F3 Freeway Rest Area Strategy and the Pacific Highway Safety Review on pages 11 to 13 of the REF. Commercial service centres generally provide these facilities, but only as part of a commercial operation that sells fuel, convenience food and other vehicle-related goods and services. While rest areas may share some functions with commercial service centres, their primary goal is to promote road user safety close to the highway. The RTA does not accept the writer's proposition that the rest area would be superfluous because the need for public rest areas is not satisfied by, and does not depend on whether, commercial service centres are provided. In addition, commercial service centres are not compatible with the services offered by Driver-Reviver stations. Since the writer's proposal is a private development subject to commercial considerations, it may or may not be constructed.
5944	1	Norley	Process	community consultation	Limited time for CLG to respond after 15 December 2004.	The RTA Pacific Highway Safety Review and the Pacific Highway Noise Taskforce Report were both publicly displayed before the release of the REF. The REF was exhibited once the RTA had defined the concept design for the proposed facility and assessed the impacts. The REF was displayed between 23 November and 22 December 2004, and has been available on the RTA's website for viewing since 23 November 2004. Public notices of the REF's exhibition were published in the Northern Star on 22 and 27 November, the Byron Shire Echo on 23 and 30 November and 7 December, and the Byron Shire News on the 24 November and 1 December. The display at the Ocean Shores Shopping Centre was staffed by RTA representatives for one day on 25 November 2004. The RTA discussed the proposed facility with the BH2Y Upgrade Community Liaison Group on 15 December 2004. The RTA generally undertakes community involvement programs that allow multiple opportunities for comment only for large projects. The scale and scope of the proposed facility did not warrant such a community involvement program. The EP&A Act does not require the RTA to exhibit REFs, but it has done so to ensure the community was given the opportunity to review and comment on the proposed facility.

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5944	2	Norley	Design	mixing heavy and light vehicle two-way traffic at Yelgun Interchange and existing Pac Hwy.	Unacceptable to place local access on the same road as a large and busy major truck and rest stop.	The RTA considers that the access to the proposed facility described in the REF is safe and workable, and is consistent with relevant RTA strategies for the provision of rest areas. The median storage lane would allow safe merging and storage for traffic entering from the north or exiting to the south, and the auxiliary lane to the Yelgun Interchange would allow safe merging onto the Yelgun Interchange. However, the RTA notes the writer's concerns regarding the mixing of traffic on the Service Road with traffic accessing the rest area. The RTA has reviewed alternative access arrangements to separate these two types of traffic and would undertake further reviews of alternative access arrangements during the detailed design phase of the proposed facility. Subject to alternative access arrangements being practical, suitable and cost effective, the RTA will modify the access to the rest area to separate traffic accessing the rest area from traffic on the Service Road.
5944	3	Norley	Process	community consultation	First brief [for BH2Y Upgrade by RTA] did not mention rest area. Would have advised then that it was unacceptable.	The RTA continually reviews and refines measures to improve road user safety. Strategies for rest areas were reported in 2001, 2003 and 2004. The concept design for the proposed facility was prepared during 2004. These documents post-date the route selection and Design Review process that occurred for the BH2Y Upgrade. The proposed facility is independent of the BH2Y Upgrade and its community involvement program.
5944	4	Norley	Traffic	safety	Rest area will place young, elderly and inexperienced drivers at risk from conflict with B Doubles, trucks and holiday and interstate traffic.	These issues were taken into account in the development of the concept design presented in the REF. In particular, the RTA gave high priority to providing good sight distance, large turning areas, effective landscaping and facilities, and providing signposting to aid drivers in the rest area. The proposed facility would separate heavy and light vehicles at the entry. Heavy vehicles would not need to move near light vehicles except where they join at the common exit. All light vehicle drivers in the rest area would be separated by landscaping and barriers from the areas where heavy vehicles circulate. The concept design would be further developed during the detailed design phase. In addition, the RTA would conduct road safety audits during the detailed design and after construction to verify the suitability of the rest area.

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5944	5	Norley	Design	alternative design	Has the RTA considered upgrading Sleepy Hollow instead of the proposed rest area or using the former batch plant site at Tyagarah?	<p>The Sleepy Hollow light and heavy vehicle rest area provides facilities on each side of the Yelgun to Chinderah Freeway. There are several unshielded rural residences in the area surrounding it. It can only accommodate five heavy vehicles on each side of the Freeway and surveys show that it is well-used, sometimes to capacity. The RTA cannot practically expand parking to accommodate more vehicles within the existing RTA-owned road reserve.</p> <p>In addition, the presence of heavy vehicles at the Sleepy Hollow rest area has created detrimental noise impacts for adjoining residences. The Northern Pacific Highway Noise Taskforce Report, prepared by the Taskforce (which included local, industry and government representatives) in August 2003, reviewed existing and potential noise issues. Section 4.15 of the Report notes that the location of truck rest areas near noise sensitive receivers is a contributing factor to increasing road traffic noise along the Pacific Highway. Heavy vehicles decelerating on approach and entry to a rest area, and then accelerating as they leave, particularly at night, are a significant concern for residents at, among other locations, Sleepy Hollow. The Report presents long term strategies for action by 2008. For the Yelgun to Chinderah Freeway, one of the long term strategies is to review the siting of the heavy vehicle rest area at Sleepy Hollow to resolve existing noise disturbance.</p> <p>As recommended by the Northern Pacific Highway Noise Taskforce Report, the RTA proposes to remove heavy vehicles from the Sleepy Hollow rest area to reduce noise impacts on adjoining residences. Once heavy vehicles are removed, the RTA would need to provide a heavy vehicle rest area within 35 to 50 km of the Queensland border, in accordance with its strategies for locating rest areas on the Pacific Highway. The proposed facility for light and heavy vehicles at Yelgun would satisfy the need for a heavy vehicle rest area once Sleepy Hollow is closed to heavy vehicles. It would also be located in a position that is removed from nearby residents and minimise the extent of noise impacts. The site for the proposed facility has been selected, in part, because it is well-shielded by landform, and is isolated from nearby residences. This would reduce potential adverse noise impacts. The REF considers road traffic noise impacts, including heavy vehicles decelerating and accelerating while entering and leaving the proposed rest area, and recommends safeguards to mitigate noise exceedance.</p> <p>The former batch plant site at Tyagarah is too far south to satisfy the location criterion in the Pacific Highway/F3 Freeway Rest Area Strategy. In addition, the site does not provide sufficient area on both sides of the Pac Hwy to accommodate heavy vehicle parking areas, and it would be less efficient than the proposed facility at Yelgun because rest area facilities and operational resources needed to maintain them would need to be duplicated for each carriageway.</p>

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5944	6	Norley	SEPP 14 wetlands	pollution	Concerned with pollution of SEPP 14 wetlands and Billinudgel Nature Reserve.	The REF identified two potential pollutants that could enter the BNR: stormwater and effluent. Pages 21 and 53 of the REF show that stormwater would be treated using a Humeceptor or similar device to remove oils, grease and suspended sediments before discharge to the existing culverts under the Pac Hwy. The use of such a device is a commonly-accepted practice for sites with large impermeable surfaces adjacent to sensitive receiving environments. The RTA would consider the need for a trash rack during the detailed design of the stormwater drainage system. The REF also shows that effluent would be treated using commercial systems that are designed in accordance with manufacturers' and local government requirements and regularly approved by local councils. During the detailed design phase for the proposed facility, the RTA would investigate options to contain spills, including a downstream storage basin with a lockable outlet. If spills occurred, then the basin outlet could be locked by emergency services and any spills or pollutants could be removed from the storage basin.
5944	7	Norley	Flora	translocation	Risks with translocation of Davidsons Plum.	The RTA understands that translocation of plants has inherent risks. As discussed in Appendix 2 of the REF, the RTA's botanist advises that it is important to preserve the genetic diversity represented by these plants. Translocation of the two Davidsons Plum adult plants and associated juveniles would provide a practical means of preserving them. If translocated to better quality habitat, they may have a better chance of long term survival and better contribute to the viability of the local population, than they would in their present location, which under present land use, has little potential for improvement.
5944	8	Norley	Traffic noise	heavy vehicles on Pac Hwy	Compression braking will disturb people.	The noise impact assessment in the REF reviewed operational noise from trucks entering and leaving the Yelgun Interchange ramps and the rest area. Based on a combined assessment methodology using road traffic and industrial noise assessment criteria, the change in noise levels from the proposed facility would satisfy relevant criteria except at the RTA-owned former Jagwen residence and the residence at Lot 4(22) Stock Route Road. There would be some changes in noise character from heavy vehicles using the Yelgun Interchange ramps to access the rest area. As discussed on page 38 of the REF, the RTA is mitigating exceedance of relevant noise criteria at Lot 4(22) Stock Route Road as part of the BH2Y Upgrade and would address noise exceedance at the RTA-owned former Jagwen residence as part of the proposed facility.
5944	9	Norley	Amenity	light pollution	Light spill from the rest area will disturb people.	The lights at the entry and exit of the rest area would be designed to prevent light spilling upwards and/or into adjacent residences and sensitive environmental areas beyond the areas required to be lit. Lights would be shielded to avoid such spill. Other than the RTA-owned former Jagwen residence (which would be protected from light spill by landscaping on the cut batter and benches), there are no known residences in direct line of sight to the lights that would be installed at the entry and exit of the proposed facility. The only people who may be disturbed by the rest area lighting are those travelling on the Service Road at night. This temporary inconvenience is outweighed by the safety benefits that such lighting would provide.

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5944	10	Norley	Traffic	local traffic	The RTA promised that the existing Pac Hwy would become a local road after BH2Y was opened. Do not turn it into a Black Spot road. It already bisects the community.	Once the BH2Y Upgrade is opened to traffic, the existing Pac Hwy would become the Service Road and would provide access for local traffic travelling between Brunswick Heads and Yelgun and beyond. However, the road status as a local service road does not affect its ability or capacity to carry heavy vehicles, including B Doubles. Access to the rest area for B Doubles would be provided in accordance with relevant RTA guidelines and would also be considered in conjunction with the RTA's further review of alternative access arrangements to the rest area during the detailed design phase of the proposed facility.
5953	1	Australian Trucking Assoc	Need	rest area	Supports the proposed rest area.	Noted.
5960	1	Greenfields Mountain Pty Ltd	Need	proposed service centre at North Ocean Shores	Objects to the proposed rest area. Confirms that Greenfields Mountain Pty Ltd has a DA for a service station, truck stop and bus and coach stop at or near Shara Blvd.	In accordance with RTA policies and strategies, RTA rest areas provide safe, convenient and cost-free facilities for drivers to rest and refresh. There is now a need to provide rest areas to promote safe driving behaviour for all road users as discussed in both the Pacific Highway/F3 Freeway Rest Area Strategy and the Pacific Highway Safety Review on pages 11 to 13 of the REF. Commercial service centres generally provide these facilities, but only as part of a commercial operation that sells fuel, convenience food and other vehicle-related goods and services. While rest areas may share some functions with commercial service centres, their primary goal is to promote road user safety close to the highway. The RTA does not accept the writer's proposition that the rest area would be superfluous because the need for public rest areas is not satisfied by, and does not depend on whether, commercial service centres are provided. In addition, commercial service centres are not compatible with the services offered by Driver-Reviver stations. Since the writer's proposal is a private development subject to commercial considerations, it may or may not be constructed.
5967	1	Conservation of North Ocean Shores	EIA process	adequacy	Dismayed that the RTA can recognise the environmental values of the Billinudgel Nature Reserve in the Yelgun to Chinderah Freeway but propose the rest area directly adjacent to the Nature Reserve.	The RTA continues to recognise the importance of the BNR. The location of the proposed facility would be separated from the BNR by the existing Pac Hwy (and future Service Road); at its closest point, the rest area would be 90 m from the boundary of the BNR. Table 7 of the REF summarises safeguards to minimise or avoid direct and indirect adverse impacts from construction and operation of the rest area, including the protection of the downstream receiving environment.
5967	2	Conservation of North Ocean Shores	Process	community consultation	The RTA advertised the proposal long after the formal submission process for BH2Y ended and confused the public.	The RTA continually reviews and refines measures to improve road user safety. Strategies for rest areas were reported in 2001, 2003 and 2004. The concept design for the proposed facility was prepared during 2004. These documents post-date the route selection and Design Review process that occurred for the BH2Y Upgrade. The proposed facility is independent of the BH2Y Upgrade and its community involvement program.
5967	3	Conservation of North Ocean Shores	Statutory	compliance with statutory requirements	The rest area wasn't subject to an EIS that is required of similar engineering projects and is totally unacceptable.	Under Part 5, an EIS is required only when an activity is likely to have a significant effect on the environment. The need for an EIS under Part 5 is not determined by the type of project or its physical scale or proximity to sensitive areas.

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5967	4	Conservation of North Ocean Shores	Process	community consultation	Emphasises the importance of BH2Y which has been delayed because of local politics. At such a late stage, it is unwise to propose the rest area in this section of the Pac Hwy.	The need for the rest area would arise with the removal of heavy vehicles from the Sleepy Hollow rest area and the opening of the BH2Y Upgrade. The proposed facility is independent of the BH2Y Upgrade and is assessed on its own merit.
5967	5	Conservation of North Ocean Shores	Process	strategic planning	The RTA should have located the rest area in a section of the Pac Hwy that hasn't yet been subject to the formal EIS process or such political pressure.	The site of the proposed facility is consistent with the RTA's policies and strategies for the provision and location of rest areas on the Pac Hwy. The RTA does not support the writer's position that the rest area should be part of a Pac Hwy project that will require an EIS. The requirement to prepare an EIS arises only when an activity is likely to have a significant effect on the environment. There is no legal or practical need to tie the rest area to a future Pacific Highway upgrading project that may require an EIS.
5967	6	Conservation of North Ocean Shores	Design	scale	The size, scale and location in such an environmentally sensitive area is unacceptable.	The size and scale of the proposed facility are similar to the rest areas discussed in the Pacific Highway/F3 Freeway Rest Area Strategy. Neither the size nor the scale of the proposed facility is exceptional when compared to other rest areas that have similar functions. The location of the proposed facility is desirable because it is isolated from residential and rural-residential land uses and it is confined by topography. While the BNR to the north of the proposed facility is an environmentally sensitive area, the vegetation on the site of the proposed facility is highly-modified and partly degraded due to previous land uses; the presence of the existing Pac Hwy (and future Service Road) effectively separates the two. The REF assessed the likely impacts of the proposed facility and identified safeguards needed to minimise direct and indirect adverse impacts.
5967	7	Conservation of North Ocean Shores	Design	mixing heavy and light vehicle two-way traffic at Yelgun Interchange and existing Pac Hwy.	Condemns the RTA's intention to accommodate traffic travelling both north and south. Advocates separate rest areas for northbound and southbound traffic, and of a scale similar to Sleepy Hollow.	The RTA considers that the access to the proposed facility described in the REF is safe and workable, and is consistent with relevant RTA strategies for the provision of rest areas. The median storage lane would allow safe merging and storage for traffic entering from the north or exiting to the south, and the auxiliary lane to the Yelgun Interchange would allow safe merging onto the Yelgun Interchange. However, the RTA notes the writer's concerns regarding the mixing of traffic on the Service Road with traffic accessing the rest area. The RTA has reviewed alternative access arrangements to separate these two types of traffic and would undertake further reviews of alternative access arrangements during the detailed design phase of the proposed facility. Subject to alternative access arrangements being practical, suitable and cost effective, the RTA will modify the access to the rest area to separate traffic accessing the rest area from traffic on the Service Road.
5967	8	Conservation of North Ocean Shores	Need	safety	Notes that the Highway Rest Area Strategy Background Report [referred to in the REF] states that major rest areas should accommodate 20 trucks and be located at 100 km intervals.	The report referred to by the writer was superseded in 2003 by the Pacific Highway/F3 Freeway Rest Area Strategy, as noted on page 12 of the REF. The Strategy recommends that rest areas should be located at 35 to 50 km intervals and that the rest areas should provide parking for between 6 and 10 B Double trucks for each carriageway. Where the rest area is combined on one side of the road, as is proposed for Yelgun, the parking capacity is doubled to provide parking for up to 20 heavy vehicles, including B Double trucks.
5967	9	Conservation of North Ocean Shores	Statutory	RTA policy	The rest area is contrary to RTA policy on development at or near interchanges.	The writer presumably refers to the Section 117 Direction S28 (issued by DIPNR under the EP&A Act) on the location of retail/commercial development on the Pac Hwy between Hexham and the Queensland border. The rest area is not a commercial or retail development.

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Sub No	Issue No	Last Name	Issue	Sub-Issue	Description	Response
5967	10	Conservation of North Ocean Shores	EIA process	adequacy	The REF is deficient and appears to be desktop only. It only addresses the site of the rest area and not the impact the development would have on the surrounding environment. Consultants have not familiarised themselves with the ecology of North Ocean Shores or Yelgun locality, nor with the NPWS database records and scientific information pertaining to the area.	The REF assesses relevant impacts likely to occur from constructing and operating the proposed facility on the surrounding environment. Information on water quality, soils and geology, and archaeology was sourced from the EIS and EIA for the BH2Y Upgrade and other environmental documents because it remains current and relevant. Fresh investigations were undertaken for flora occurring on the site, noise impacts and urban design and landscaping concepts. These information sources allowed a focused assessment to be prepared on likely direct and indirect impacts, and effective safeguards to be formulated to mitigate adverse impacts.
5967	11	Conservation of North Ocean Shores	Fauna	adequacy	The REF is completely false and misleading because it states that no threatened fauna have been recorded in or near the site of the rest area.	The EIS for the BH2Y Upgrade shows that no threatened fauna species were recorded on the site for the rest area. The RTA acknowledges that BNR supports a wide range of threatened fauna species. The EIS for the BH2Y Upgrade described and considered impacts on threatened fauna species in BNR for the previous concept design of the Yelgun Interchange, which was located closer to BNR than the concept design now approved. However, the proposed facility would be unlikely to have an effect on threatened fauna species in BNR. In particular, the lack of threatened species habitat in the rest area, the barrier created by the existing Pacific Highway (and future Service Road) and the proposed fauna exclusion fencing would minimise opportunities for threatened fauna to use the site or be harmed by construction or operation of the rest area.
5967	12	Conservation of North Ocean Shores	EIA process	adequacy	The REF does not incorporate a species impact statement or an 8 part test for any species other than Davidsons Plum. A species impact statement is required because 44 threatened fauna species have been recorded for the Billinudgel Nature Reserve alone.	Sections 111 and 112 of the EP&A Act require the proponent of an activity to consider whether the activity will have or is likely to have a significant effect on species, populations or ecological communities, or their habitats. If the activity does, then the activity cannot be approved without first having prepared a species impact statement and receiving concurrence from the Director-General of DEC. The RTA acknowledges that BNR supports a wide range of threatened fauna species. The EIS for the BH2Y Upgrade described and considered impacts on fauna threatened species in BNR for the previous concept design of the Yelgun Interchange, which was located closer to BNR than the concept design now approved. However, the proposed facility would be unlikely to have an effect on threatened species in BNR. In particular, the lack of threatened species habitat in the rest area, the barrier created by the existing Pacific Highway (and future Service Road) and the proposed fauna exclusion fencing would minimise opportunities for threatened fauna to use the site or be harmed by construction or operation of the rest area. Light spill would be confined to surface areas that require lighting and stormwater would be treated before being discharged into existing culverts and drainage lines that flow towards BNR. Based on these considerations, the proposed facility would not affect threatened fauna species in BNR. Consequently, there was no need to prepare 8 part tests for the threatened species found in BNR and an SIS is not required.

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Sub No	Issue No	Last Name	Issue	Sub-Issue	Description	Response
5967	13	Conservation of North Ocean Shores	EIA process	adequacy	The REF does not address the impact of the rest area on the receiving environment other than a reference to pollutants being diverted into SEPP 14 wetlands.	<p>The REF identified two potential pollutants that could enter the BNR: stormwater and effluent. Pages 21 and 53 of the REF show that stormwater would be treated using a Humeceptor or similar device to remove oils, grease and suspended sediments before discharge to the existing culverts under the Pac Hwy. The use of such a device is a commonly-accepted practice for sites with large impermeable surfaces adjacent to sensitive receiving environments. The RTA would consider the need for a trash rack during the detailed design of the stormwater drainage system. The REF also shows that effluent would be treated using commercial systems that are designed in accordance with manufacturers' and local government requirements and regularly approved by local councils. During the detailed design phase for the proposed facility, the RTA would investigate options to contain spills, including a downstream storage basin with a lockable outlet. If spills occurred, then the basin outlet could be locked by emergency services and any spills or pollutants could be removed from the storage basin.</p> <p>The REF considers relevant impacts both within and beyond the site of the rest area. The proposed safeguards would ensure that risks to the environment are minimised. Other indirect impacts on flora and fauna in BNR and the SEPP 14 wetlands, such as light, noise and fauna mortality from vehicle collision, would be minimal given the separation and barrier imposed by the existing Pac Hwy (and future Service Road) and the proposed fauna exclusion fencing.</p> <p>When the Sleepy Hollow rest area is closed to heavy vehicles, a heavy vehicle rest area should be provided within 50 km, and preferably 35 km, of the Queensland border. Several submissions suggest that the RTA use the areas either side of the Pac Hwy at Tyagarah. However, this location is too far south to satisfy the location criterion in the Pacific Highway/F3 Freeway Rest Area Strategy. In addition, the site does not provide sufficient area to accommodate heavy vehicle parking areas, and it would be less efficient than the proposed facility at Yelgun because rest area facilities, and the operational resources needed to maintain them, would be duplicated for each carriageway.</p>
5967	14	Conservation of North Ocean Shores	EIA process	location	It appears that the consultants have looked at the rest area in isolation and not considered adjoining sections for the Yelgun to Chinderah Freeway or the Ewingsdale to Brunswick River sections. Alternative options are available as outlined in the submission.	<p>The RTA acknowledges this error and would contact these two local groups if wildlife were injured during clearing, as described on page 43 of the REF.</p>
5967	15	Conservation of North Ocean Shores	Fauna	mitigation	The REF does not recognise local wildlife care groups and instead refers to an organisation in the Hunter/Taree region. This highlights the lack of research and community consultation.	<p>While the RTA notes the writer's views, the use of a specialist ecologist, as discussed on page 43 of the REF, with extensive knowledge of Davidsons Plum would minimise translocation risks. The RTA considers that the best option available to retain genetic material is translocation of the Davidsons Plum plants, as recommended in Appendix 2 of the REF. The plants cannot be avoided, as discussed on pages 39 to 42 of the REF. The impact on the plants, and the safeguards proposed on pages 42 to 44 of the REF, would result in the proposed facility not having a significant effect on this species. Translocation would be consistent with the approach used on the BH2Y Upgrade and would only be undertaken with the approval of DEC.</p>
5967	16	Conservation of North Ocean Shores	Flora	mitigation	Translocation of threatened plant species for the Yelgun to Chinderah Freeway was below expectations. Opposes translocation and recommends that Davidsons Plum plants remain in place.	<p>The RTA acknowledges this error and would contact these two local groups if wildlife were injured during clearing, as described on page 43 of the REF.</p>

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Sub No	Issue No	Last Name	Issue	Sub-Issue	Description	Response
5967	17	Conservation of North Ocean Shores	EIA process	adequacy	The rest are will further impact on the adjacent Billinudgel Nature Reserve due to: high conservation biodiversity; presence of 44 threatened animals; movement of animals with the area east of BH2Y; migratory, JAMBA and CAMBA birds all of which occur on or adjacent to the rest area; compromising the integrity of an area with high archaeological significance -- 30 sites have been registered with the NPWS in the Nature Reserve and surrounding lands; proposal to direct stormwater; effluent and pollutants into SEPP 14 wetlands and Nature Reserve; the presence of EEC Freshwater Wetlands on Coastal Floodplains of NSW; and acid sulphate soils are known to occur at North Ocean Shores.	<p>The EIS for the BH2Y Upgrade described and considered impacts on threatened species in BNR for the previous concept design of the Yelgun Interchange, which was located closer to BNR than the concept design now approved. The rest area would not have direct or indirect impacts on flora and fauna in BNR. The site for the rest area does not provide unique resources for migratory birds that cannot be found in abundance in the adjoining locality. There are no known Aboriginal objects or sites south of the Pac Hwy on the RTA-owned former Jagwen property and the integrity of sites in BNR would not be compromised by the rest area. Direct impacts from runoff would be minimised by treating stormwater runoff. During the detailed design phase for the proposed facility, the RTA would investigate options to contain spills, including a downstream storage basin with a lockable outlet. If spills occurred, then the basin outlet could be locked by emergency services and any spills or pollutants could be removed from the storage basin. The site is mostly cleared and does not support the species described in the EEC. The REF addresses management of ASS on page 56 of the REF. The lights at the entry and exit of the rest area would be designed to prevent light spilling upwards and/or into adjacent residences and sensitive environmental areas beyond the areas required to be lit. Lights would be shielded to avoid such spill.</p> <p>The REF considers relevant impacts both within and beyond the site of the rest area. The proposed safeguards would ensure that risks to the environment are minimised.</p>
5967	18	Conservation of North Ocean Shores	EIA process	location	The majority of rest areas on the Pac Hwy are constructed on level ground and not the base of a ridge line as proposed at Yelgun. Concerned with erosion, quantity of fill, pollutant runoff and effluent disposal.	<p>The location of the proposed facility is desirable because it is isolated from residential and rural-residential land uses and it is confined by topography. The proposed facility would also be shielded from properties to the east, south (except the RTA-owned former Jagwen residence) and west because of its placement at the base of the slope. The construction and maintenance of the cut batters would be similar to the cuts required elsewhere on the Pacific Highway. The construction contractor would be experienced in controlling construction impacts, including the use of erosion and sedimentation control measures. As noted on page 55 of the REF, construction impacts would be managed in a Soil and Water Management Plan. Runoff would be treated before discharge to remove sediments and oil/grease, as noted on page 21 of the REF. Effluent would be managed on site using commercial treatment processes that are acceptable to and regularly approved by local councils, as noted on page 24 of the REF.</p>

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Sub No	Issue No	Last Name	Issue	Sub-Issue	Description	Response
5967	19	Conservation of North Ocean Shores	EIA process	adequacy	Noise, light and pollutants could have adverse effects on the surrounding areas and BNR. Nocturnal species are likely to be affected and certain avifauna may be attracted to the lights at the rest area. There will be fauna mortality from the increase in traffic entering and exiting the rest area.	After the BH2Y Upgrade is opened, traffic on the Service Road will be substantial lower and road traffic noise will be reduced in BNR. The proposed facility would increase road traffic noise over a section of the Service Road, but the increase (after the BH2Y Upgrade is opened) would be small, as shown in Table 2 of the REF. The lights at the entry and exit of the rest area would be designed to prevent light spilling upwards and/or into adjacent residences and sensitive environmental areas beyond the areas required to be lit. Lights would be shielded to avoid such spill. During the detailed design phase for the proposed facility, the RTA would investigate options to contain spills, including a downstream storage basin with a lockable outlet. If spills occurred, then the basin outlet could be locked by emergency services and any spills or pollutants could be removed from the storage basin. Given that BNR is a minimum of 90 m from the rest area, and the safeguards that would be implemented during construction and operation, the magnitude and spatial extent of these indirect impacts would be minimal. The barrier imposed by the existing Pac Hwy (and future Service Road) and the proposed fauna exclusion fencing would minimise impacts to fauna in BNR from traffic entering and exiting the rest area.
5967	20	Conservation of North Ocean Shores	Fauna	mitigation	The Minister for Roads directed the RTA to provide a fauna underpass and exclusion fencing either side of the Yelgun to Chinderah Freeway at the location proposed for the rest area. It is difficult to understand why the RTA recognised this area's environmental sensitivity and now proposes to construct the rest area in the same location. The proposal is contrary to the Minister's and the RTA's environmental stance for the North Ocean Shores and Yelgun area.	It is incorrect to state that the fauna underpass and exclusion fencing is at the location proposed for the rest area. The fauna underpass is located at the southern end of the Yelgun to Chinderah Freeway, at least 600 m north of the Yelgun Interchange. The proposed fauna exclusion fencing shown in the Conybeare Morrison Concept Plan and Detail in Appendix 1 of the REF would connect to existing fencing leading to the fauna underpass. The proposed facility would not reduce the effectiveness of the fauna mitigation measures provided by the RTA for the Freeway. The vegetation on the site of the proposed facility is highly-modified and partly degraded due to previous land uses and the presence of the existing Pac Hwy (and future Service Road).

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Sub No	Issue No	Last Name	Issue	Sub-Issue	Description	Response
5967	21	Conservation of North Ocean Shores	EIA process	ESD	The REF is not consistent with the four principles of ESD because potential impacts to the surrounding environment have not been identified or assessed in the REF.	The REF considers direct and indirect impacts on the surrounding environment from the rest area on flora and fauna, noise receivers and water quality. The impacts of the rest area are generally confined by the existing Pac Hwy (and future Service Road) and surrounding topography, and would be minimised by the proposed safeguards shown in Table 7 of the REF. There would be no direct impacts on fauna at the site of the rest area because it is highly-modified agricultural land. Impacts on Davidsons Plum would be managed by translocation, subject to approval from DEC. Impacts on water quality in BNR would be managed by installing stormwater and effluent management systems. The RTA would investigate options to contain spills, including a downstream storage basin with a lockable outlet. Impacts on fauna in BNR would be minimised by installing fauna exclusion fencing on the north side of the Service Road. Indirect impacts from noise and light would be minimal because light spill would be controlled and noise from traffic accessing the rest area would not substantially increase (once the BH2Y Upgrade is opened). The REF considers relevant impacts both within and beyond the site of the rest area and the assessment process is therefore consistent with ESD, as shown on page 4 of the REF.
5967	22	Conservation of North Ocean Shores	EIA process	Clause 228 factors	The REF consultants have only applied the Clause 228 factors to the actual site for the rest area and not the surrounding area and receiving environment. The writer believes that likely impacts occur in all criteria under Clause 228.	Table 8 in the REF responds to the factors given in Clause 228 of the EP&A Reg. The response takes into account impacts and proposed safeguards presented in Table 7 of the REF. Table 8 shows that there would be no likely impact (after safeguards are implemented) under subclauses (e), (i), (j), (l), (m) and (n) either because the safeguards would minimise or avoid impacts, or because the proposed facility would not have an impact on matters described in the subclauses. The writer's contention that impacts would occur under all subclauses does not consider the mitigation provided by the proposed safeguards in Table 7 of the REF.

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Sub No	Issue No	Last Name	Issue	Sub-Issue	Description	Response
5967	23	Conservation of North Ocean Shores	Statutory	adequacy	<p>The RTA must consider environmental impact [Sections 111 and 112 of the EP&A Act].</p> <p>The writer cites Part 2 of Schedule 3 [of the EP&A Regulation, dealing with additional and alterations to approved development] and states that the determining authority must take into account certain factors, and in particular those in Subclause 2(b). The writer opposes the rest area because the alteration/addition to the existing approved development could significantly increase the environmental impacts of the total development. The RTA would need to prepare an EIS if the proposal were to proceed.</p>	<p>Part 2 of Schedule 3 of the EP&A Reg is only relevant to developments for which consent is required from a consent authority such as a local council. Schedule 3 is used to determine whether development, or additions and alterations to development, are designated development. The rest area does not require development consent, so Schedule 3 does not apply. The need for an EIS under Part 5 of the EP&A Act only arises if the activity is likely to have a significant effect on the environment.</p>
5967	24	Conservation of North Ocean Shores	Social impact	impacts	<p>The rest area is located near North Ocean Shores, South Golden Beach, Billinudgel and Yelgun. The size of the rest area is totally unacceptable in a location so close to these towns.</p>	<p>The rest area is located at least 600 m north of Shara Blvd and more than one kilometre from Wilfred Street in Billinudgel. It is separated from North Ocean Shores by the BNR. Intervening topography and landscaping would shield views to the rest area from the east and south; the BH2Y Upgrade would shield views to the rest area from the west. The surface of the rest area is about 2 ha and is similar to the combined size of the Sleepy Hollow rest area. The rest area is not so close to nearby settlements that it would detrimentally affect amenity from noise, light spill or visual impacts.</p>

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Sub No	Issue No	Last Name	Issue	Sub-Issue	Description	Response
5967	25	Conservation of North Ocean Shores	Process	community consultation	Some of the villages [near the rest area] are rural. These residents have already been disadvantaged by increased noise and night lighting that will occur at the Yelgun Interchange. The RTA now proposes the rest area adjacent to the same location, six years after the formal submission process was finalised. In September 2001, the RTA reopened the submission process for comment on the Design Review and did not include the rest area in it. This is unprofessional and unacceptable.	The RTA continually reviews and refines measures to improve road user safety. The RTA finalised the Pacific Highway/F3 Freeway Rest Area Strategy in 2003 and the Pacific Highway Safety Review in 2004. The concept design for the proposed facility was prepared during 2004. These documents post-date the route selection process and Design Review. The proposed facility is independent of the BH2Y Upgrade and its community involvement program.
5967	26	Conservation of North Ocean Shores	EIA process	strategic planning	It is more than apparent that a rest area of this size is best located away from nearby towns and on an isolated stretch of highway. Billinudgel is one of three villages earmarked for future rural residential development.	The proposed rest area has been located on RTA-owned land at Yelgun based on criteria discussed in the reports prepared in 2001, 2003 and 2004 discussed on pages 11 to 13 of the REF, and the existing site constraints on land adjoining the Pac Hwy. The separation between Billinudgel and the rest area, including the ridge on the RTA-owned former Jagwen property, would prevent adverse changes to amenity at Billinudgel.
5967	27	Conservation of North Ocean Shores	EIA process	strategic planning	The REF states that the presence of urban and rural development, ecological constraints and topography limit suitable sites. Yet the consultants have not assessed the impact of the rest area on future growth of Billinudgel. This is a contradiction.	The proposed rest area would be separated from Billinudgel by topography and the Service Road. It would not alter potential development that may occur at Billinudgel.
5967	28	Conservation of North Ocean Shores	EIA process	location	Byron Shire is small and has already been affected by three major interchanges (four when the Yelgun Interchange is completed). The added impact of the rest area on the amenity and environmental values of Byron Shire is not warranted. There are more suitable sites.	The suitability of a rest area site does not depend on the number of interchanges in a local government area. The cumulative impact of road projects (including interchanges) on the amenity of a local government area is likely to be both adverse (direct impacts adjoining the road) and positive (increased safety for all road users). The site for the rest area is consistent with RTA policies and strategies for the location of rest areas on the Pac Hwy. It is well suited to road users and should not be moved out of the Byron Shire area because of the number of interchanges on the Pac Hwy.

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Sub No	Issue No	Last Name	Issue	Sub-Issue	Description	Response
5967	29	Conservation of North Ocean Shores	Design	mixing heavy and light vehicle two-way traffic at Yelgun Interchange and existing Pac Hwy.	The writer objects to locating the rest area on a local road, thereby mixing highway with local traffic. This is contrary to the RTA's stance in justifying the need to separate local and highway traffic.	The RTA considers that the access to the proposed facility described in the REF is safe and workable, and is consistent with relevant RTA strategies for the provision of rest areas. The median storage lane would allow safe merging and storage for traffic entering from the north or exiting to the south, and the auxiliary lane to the Yelgun Interchange would allow safe merging onto the Yelgun Interchange. However, the RTA notes the writer's concerns regarding the mixing of traffic on the Service Road with traffic accessing the rest area. The RTA has reviewed alternative access arrangements to separate these two types of traffic and would undertake further reviews of alternative access arrangements during the detailed design phase of the proposed facility. Subject to alternative access arrangements being practical, suitable and cost effective, the RTA will modify the access to the rest area to separate traffic accessing the rest area from traffic on the Service Road.
5967	30	Conservation of North Ocean Shores	Design	Driver-Reviver operation	Including the Driver-Reviver is not wise. Combining local and highway traffic, light and heavy vehicles, elderly and inexperienced drivers negotiating B Doubles for a cup of coffee raises safety concerns and is not acceptable. With the closure of the Driver-Reviver at Brunswick Heads, a new location will need to be found during construction of the BH2Y. The writer recommends that the Driver-Reviver be permanently located near the Tyagarah service station.	The Driver-Reviver station would be located in the light vehicle part of the proposed facility. It would be separated from heavy vehicles except those existing in the rest area. Heavy vehicles, including B Doubles, would not mix with patrons using the Driver-Reviver station. The presence of light vehicles driven by elderly and inexperienced drivers would occur at any Driver-Reviver station. While the existing site at Tyagarah could accommodate the Driver-Reviver station, there would be a benefit in combining it with the proposed facility. It would also be closer to the facility it would be replacing at the Brunswick River than Tyagarah would be. The RTA also notes that the Brunswick Heads Lions Club, the group that operates the Driver-Reviver station, supports its relocation to the proposed facility. Relocation to Tyagarah would require longer journeys by Club members to staff the station and duplication of the facilities and operational resources required to service both sides of the Pac Hwy.

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Sub No	Issue No	Last Name	Issue	Sub-Issue	Description	Response
5967	31	Conservation of North Ocean Shores	Process	community consultation	The RTA's effort to consult is dismal. The REF states that the RTA would consult with the [BH2Y] Community Liaison Group. The first meeting after the start of the exhibition was on 15 December and allowed very little time for feedback to community groups and individuals before the exhibition closed. It is most unfortunate that the RTA did not liaise with the local community and environment groups as it would have become apparent that the proposal and location were entirely unsuitable.	The RTA Pacific Highway Safety Review and the Pacific Highway Noise Taskforce Report were both publicly displayed before the release of the REF. The REF was exhibited once the RTA had defined the concept design for the proposed facility and assessed the impacts. The REF was displayed between 23 November and 22 December 2004, and has been available on the RTA's website for viewing since 23 November 2004. Public notices of the REF's exhibition were published in the Northern Star on 22 and 27 November, the Byron Shire Echo on 23 and 30 November and 7 December, and the Byron Shire News on the 24 November and 1 December. The display at the Ocean Shores Shopping Centre was staffed by RTA representatives for one day on 25 November 2004. The RTA discussed the proposed facility with the BH2Y Upgrade Community Liaison Group on 15 December 2004. The RTA generally undertakes community involvement programs that allow multiple opportunities for comment only for large projects. The scale and scope of the proposed facility did not warrant such a community involvement program. The EP&A Act does not require the RTA to exhibit REFs, but it has done so to ensure the community was given the opportunity to review and comment on the proposed facility.
5967	32	Conservation of North Ocean Shores	Process	community consultation	The writer understands that at the CLG meeting on 15 December 2004, members made it very clear to the RTA that they were very unhappy with the proposal and that they did not support it in any shape or form.	Minutes from this meeting show that members of the CLG raised concern with safety: trucks would need to use the Yelgun Interchange and ramps to access the rest area; and a separation of local and rest area traffic was important and that the rest area would be better accessed directly from the BH2Y Upgrade.
5967	33	Conservation of North Ocean Shores	EIA process	adequacy	The consultants did not address alternative options in the REF and instead chose to address the do-nothing option.	The Pacific Highway/F3 Freeway Truck Rest Area Strategy provides locational criteria for rest areas. The proposed facility at Yelgun would satisfy these criteria once heavy vehicles were removed from the Sleepy Hollow rest area. The RTA has broadly considered whether a combined light/heavy vehicle rest area similar to the proposed facility could be provided on the Pacific Highway between Ballina and the Queensland border that would satisfy the locational criteria. It concluded that the Yelgun site was the best location because it would not conflict with adjoining land uses, and it was practical and cost-effective to construct. Neither Sleepy Hollow nor Tyagarah are suitable sites: Sleepy Hollow cannot accommodate heavy vehicles without adversely affecting adjoining residents; Tyagarah would be too far south of the Queensland border to accommodate heavy vehicles according to the locational criteria.