



CLARENCE ENVIRONMENT CENTRE

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Date: 25th June 2012

The General Manager
Clarence Valley Council

Copies to all Councillors

Dear General Manager and Councillors

Proposed Yamba Bypass

Firstly, allow me to apologise for this last minute approach, but the Clarence Environment Centre has only just learned of the above proposal which, we now learn has not been placed on public exhibition. Nevertheless, having read relevant letters and documents, we need to highlight what we see as significant deficiencies in the arguments supporting last week's decision by Council's Civil and Corporate Committee to recommend construction of the bypass.

I should point out that our own team has yet to visit the site, so the following is based solely on the documentation made available to us.

A major concern to us is the reported occurrence of three threatened species on site one of which, the Squirrel Glider, would in our opinion be seriously impacted by the proposal. This assessment has also been presented by the consultants, North Coast Environment Planning, that recommended a Species Impact Statement be prepared, detailing mitigation measures to manage these animals.

The Committee's recommendation to proceed with construction of the bypass by "*adopting a centreline through the middle of the road reserve which skirts the tree*" (Donges. May 30), simply cannot avoid impacts on the Squirrel Glider population. These animals are dependent on a home range far beyond the den site which has been identified in the tree in question.

That same letter, from Council's Deputy General Manager, also describes the endangered *Acronychia littoralis*, which is a tree that grows to about six metres in height, as an orchid, which indicates that the Committee has little understanding of ecological matters, and raises the question of why Civil and Corporate is making these decisions in the first place?

"Gliders of Australia" - David Lindenmayer, 2002, explains that Squirrel Gliders require a minimum home range in excess of one hectare. The reason for this is the fact that high quality food sources, ranging from tree sap, to nectar and pollen, to invertebrates, change throughout the year, and the availability of these resources determines the extent of their range.

According to Lindenmayer, Squirrel Gliders adapt well to linear habitat such as that provided by road verges, and which is also the case with the proposed Yamba bypass site. However, he stresses that any loss of tree habitat along that corridor, will necessitate the Gliders travelling further in search of food, something that may not be physically possible.

As well Lindenmayer stresses the point that *“gliders have very strong affinities to their home range. This means that even if most of their home range is destroyed they will not shift to adjacent areas of forest or woodland. Rather they will often remain in the disturbed area until they die or are captured by predators”*.

To suggest that a road can be constructed around a den tree, without impacting on this threatened species, is beyond comprehension.

It appears this project's main purpose is to facilitate the development of the West Yamba subdivision (a suburb with a “use by date”) and we believe the provision of any access infrastructure should be solely the responsibility of the developer, and not, as is the case with the recent Review of Environmental Factors, paid for by ratepayers. That should include compiling an Environmental Impact Statement, and Species Impact Statement, assessing the cumulative impacts of the entire West Yamba development. This process would require a comprehensive list of Director General's requirements from the Office of Environment and Heritage.

It appears that, not only has this proposal not been placed on public exhibition, but there has been virtually no community consultation. However, residents were clearly informed (Donges May 3) in relation to the proposed road that there were *“no plans, no funds and no need”*. Yet barely 4 weeks later the Committee has recommended the proposal be given the go-ahead at still more cost to ratepayers, costs that may or may not be recouped at some time in the future. This makes no sense at all.

In conclusion, we urge Council to reappraise this proposal, seek advice from both the Office of Environment and Department of Planning and, based on the “no funds and no need” assessment that was made by Councils DGM as recently as May 3, consider the full environmental, social and economic implications of the proposal before following the Committee's recommendation.

Yours sincerely
John Edwards
Honorary Secretary.

Copies to - Department of Planning
- Office of Environment and Heritage