

**Submission
No 43**

INQUIRY INTO PACIFIC HIGHWAY UPGRADES: COFFS HARBOUR

Organisation: Coffs Harbour City Council

Name: Mr Stephen Sawtell

Telephone: 02 66484000

Date Received: 9/11/2005

Subject:

Summary

The key issues Council wishes addressed as part of the Coffs Harbour Pacific Highway Planning strategy are as follows;

- Establishment of a future Pacific Highway Western by-pass route from south of Coffs Harbour to north of Woolgoolga
 - Establishment of a planning and design program for the Pacific Highway Coffs Harbour deviation project which would see works commenced within five years.
 - Establishment of a program of works which addresses existing Pacific Highway road safety issues and provides improvements to the existing Highway pending completion of Highway upgrade works. These works to include reduced speed limits, centreline barrier separation, speed cameras and red light cameras where required.
- Establishment of a fuel rebate or subsidy system to encourage heavy vehicle operators to use the New England Highway.

Coffs Harbour City Council



Winner - "Enhancing the Landscape", and Silver Medal - "Most Liveable City" - 2004 International Awards for Liveable Communities.

Our ref: 1226187

8 November 2005

The Hon. J Gardiner MLC
Legislative Council
General Purpose Study Committee No. 4
Parliament House
Macquarie Street
SYDNEY NSW 2000

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Dear The Hon. J Gardiner

Inquiry into Pacific Highway Upgrades: Coffs Harbour

Coffs Harbour City Council welcomes the opportunity to provide a submission to the Inquiry into Pacific Highway Upgrades in Coffs Harbour. This submission focuses on points 1a) and 1b) of the Inquiry's terms of reference.

With specific reference to 1a); Appendix A attached provides a detailed summary of Councils resolutions and actions since inception of the Coffs Harbour Pacific Highway Planning strategy.

The key issues Council wishes addressed as part of the Coffs Harbour Pacific Highway Planning strategy are as follows;

- Establishment of a future Pacific Highway Western by-pass route from south of Coffs Harbour to north of Woolgoolga
- Establishment of a planning and design program for the Pacific Highway Coffs Harbour deviation project which would see works commenced within five years.
- Establishment of a program of works which addresses existing Pacific Highway road safety issues and provides improvements to the existing Highway pending completion of Highway upgrade works. These works to include reduced speed limits, centreline barrier separation, speed cameras and red light cameras where required.
- Establishment of a fuel rebate or subsidy system to encourage heavy vehicle operators to use the New England Highway.

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- Communications to: The General Manager, Locked Bag 155, Coffs Harbour NSW 2450
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- Tel: (02) 6648 4000 • Fax: (02) 6648 4199 • DX: 7559 • ABN 79 126 214 487
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Council at its meeting of 29 October 2003 resolved to adopt its "preferred corridor option for the Pacific Highway Bypass". The Coffs Harbour City Council preferred corridor comprises an 11.4 km section of the Coastal Ridge Way option from Englands Road to the northern side of Ulidarra National Park, a 27km section through the Bucca Valley from Ulidarra National Park to Arrawarra Creek, and a 16 km section from Arrawarra Creek to Halfway Creek.

RTA strategic cost estimates for the CHCC preferred corridor options vary from 1.025 to 1.650 billion dollars.

At 11.00am on Tuesday 7 December 2004 the RTA, through a media conference, released its "Preferred Route" for the Coffs Harbour Highway Planning Strategy. The RTA route includes options IS1 and IN2 a 12.6 km deviation around the Coffs Harbour urban area from Englands Road, through North Boambee Valley, under Roberts Hill ridge (tunnel), then west of Shephards Lane and Gatelys Road, through West Korora Basin and back to the existing Highway Corridor at Korora Hill.

For approximately 14 km, from Korora, through Sapphire, Moonee Beach, Emerald and Sandy Beach to Hearnese Lake Road the RTA preferred route follows the alignment of the existing Highway.

At Hearnese Lake Road, the preferred Option E (9.9 km) detours to the west of the South Woolgoolga urban investigation area, through Wedding Bells State Forest and rejoins the existing Highway at Arrawarra Creek.

RTA strategic cost estimate for the RTA preferred corridor is \$900 Million.

Previous to this announcement Council had conducted a number of Pacific Highway planning strategy forums with the Coffs Harbour community. Participants at these community forums agreed on a set of key objectives to use in assessing Pacific Highway route options.

1. To have short-term amelioration of noise/safety issues addressed within 2 years.
2. To have the Pacific Highway Planning Strategy considered as a single project.
3. To ensure the impacts of options for upgrading the existing highway through urban areas are fully considered.
4. To ensure the design development phase and ongoing maintenance integrates best practice noise mitigation measures at the source rather than the receiving end.
5. To achieve the highest possible visual amenity for the highway and surrounding areas.
6. To ensure the Pacific Highway Planning Strategy complements and connects with the City's local transport.
7. To achieve adequate compensation for property owners impacted upon by the alignment of the selected route.
8. To protect prominent ridgelines that provide the green backdrop to the City.

9. To ensure the Pacific Highway Planning Strategy incorporates the redesign of the existing highway through urban centres that are bypassed.
10. To ensure any selected route minimises impacts on people/residential areas, agriculture, tourism and environmental values.
11. To ensure the route maximises potential residential development for the sustainable growth of the City.

Council applied these objectives where applicable in assessing the "preferred corridor option for the Pacific Highway Bypass". The following key issues emerged from this assessment.

Timing

While the RTA program for the Pacific Highway upgrade may see work commence on the Sapphire to Woolgoolga section within the next 5–6 years, the Coffs Harbour deviation proposal still has a 20-year planning timeframe.

This potentially leaves the Coffs Harbour urban area with existing traffic and road safety problems for an unacceptably long time. The effect on members of the community who own property along the preferred routes will also be unacceptable with such an extended planning horizon. Those property owners that are directly affected by potential land acquisitions should not be required to wait without a higher degree of certainty regarding the Highway project.

A program which offers acquisition of land affected by the preferred route immediately upon rezoning of the land is required as part of the project. Council also seeks inclusion of the Coffs Harbour Deviation works in the same time frames as the Sapphire to Woolgoolga sections of the project.

The preferred route as detailed cannot be endorsed by Council as a bypass option. Council seeks an undertaking by the State Government to continue investigation of a western bypass of Coffs Harbour from Coffs Harbour South to a point north of the Coffs Harbour Local Government boundary.

Council therefore:

- Seeks commitment from State and Federal Government to a future far western bypass of the Coffs Harbour area.
- Seeks commencement of the Pacific Highway Coffs Harbour Deviation works within the same timeframe as Sapphire to Woolgoolga.
- Seeks commitment to a program which offers acquisition of land affected by the preferred route immediately upon rezoning of the land.

Existing Highway

The RTA preferred option provides the potential for effective deviation of through traffic around the existing Coffs Harbour and Woolgoolga urban areas. This could provide greater opportunity for Council and the RTA to investigate traffic management and main street treatments on the Highway to better cater for local traffic movement.

The Korora to Hearne's Lake Road option however maintains the reliance on the Pacific Highway for local and through traffic which is currently proving to be unacceptable. A program of works is required on the Pacific Highway north of Coffs Harbour which addresses existing safety issues and provides improvements to the existing Highway pending completion of the Highway upgrade.

Intersections requiring upgrade include; Moonee Beach Road, Fiddaman's Road, Graham Drive, Hearn's Lake Road and Bosworth Road

Council therefore:

- Seeks inclusion in costing for the preferred options a program of works on the Pacific Highway north of Coffs Harbour which addresses existing safety issues and provides improvements to the existing Highway pending completion of the Highway upgrade. These works to include reduced speed limits, centreline barrier separation, speed cameras and red light cameras where required.
- Seeks assurance that provision of a local road/service road parallel to the Pacific Highway upgrade is included where possible in the Korora to Hearn's Lake Road section of proposed upgrade.
- Seeks inclusion in costing for the preferred options of funding for completion of the Northern Beaches Cycleway project

Heavy Vehicles

Traffic studies have shown that there has been an increase in heavy vehicle volumes on the Pacific Highway as a result of completion of key Pacific Highway upgrade projects. For example, average daily heavy vehicle movements on the Pacific Highway through Coffs Harbour were around 1450 prior to the opening of Yelgun to Chinderah, which has increased to 1700 since opening.

Some of these additional movements are due to induced demand and natural growth, however some are a direct transfer of movements from the New England Highway. The economic loss to towns on the New England Highway due to the reduction in heavy vehicle volumes has not been assessed and should be included in consideration of options for the management of Sydney-Brisbane road freight.

The long timeframes previously discussed which are being considered for the Highway deviation options means that the Coffs Harbour community will potentially bear the negative road safety and amenity impacts of high heavy vehicle volumes on the Pacific Highway for some time to come.

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Anecdotal evidence suggests that heavy vehicle operators are choosing the Pacific Highway over the New England due to significant savings in fuel costs. While this may also provide benefit in terms of environment and resource management, consideration should be given to provision of a fuel rebate or subsidy system to encourage heavy vehicle operators to use the New England Highway.

Council therefore:

- Seeks a commitment to consideration of provision of a fuel rebate or subsidy system to encourage heavy vehicle operators to use the New England Highway.

Impact on Urban Development (Southern)

Both the IS1 and IS2 options bisect Stages 2 and 3 of the North Boambee Valley Release Area. The release area was to accommodate a population of 9,350 people. Council will need a new strategic plan and Developer Contributions Plan for the area. Future population could be reduced from 9,350 to 3,870, a loss of planned 2,109 dwellings (currently a potential loss of between \$20m and \$26m in contributions (water/sewer and Section 94). Additionally, the community will face a loss in potential rate and development application fee income. Similarly the State government will suffer reduced income through stamp duty and GST from the construction.

Of the two options, IS1 and IS2, the IS2 option has lesser impact on future development in the North Boambee Valley.

Council therefore:

- Seeks abandonment of the IS1 option in favour of the IS2 option.

In regard to 1b) of the Inquiry's terms of reference.

- Council zoned the "Bonville Deviation" Special Uses Classified Roads in Local Environmental Plan 1988 and this has been integrated into LEP 2000. Council has maintained support for the deviation and has actively sought to progress commencement (refer above meeting 6 April 2005 with Minister for Roads).

Council's position on the Pacific Highway Planning Strategy is as per its 29 October 2003 and its 16 December 2004 resolution; ie, it supports a far western by-pass of the Coffs Harbour area.

Council also want to limit the apprehension currently being experienced by its community. This apprehension is a result of numerous landowner's lives and livelihoods being put on hold until the RTA decides to action the Strategy.

Council has listened to the community and wants to limit the social, economic and environmental impacts of the Coffs Harbour Pacific Highway Planning Strategy. Council also want action on the long overdue Bonville Deviation.

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For further information please contact Councils Design Manager Mr George Stulle on 02 66484425 or Councils Strategic Planning Manager Mr Clyde Treadwell on 02 6648 4650.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Pat Littler', written over a horizontal line.

Pat Littler
General Manager (Acting)

Appendix A

- The issue of western by-pass of Coffs Harbour was identified in the Coffs Harbour Road Transport Study (PPK Consultants 1992). This became a "conceptual" by-pass in Council's Local Environmental Study 1997. Refer Attachment 1 which shows a possible route commencing in the Repton area, traversing the Orara Valley and then connecting to Halfway Creek in the north.
- Council, at its Engineering Committee Meeting on 11 November 1999 (Resolution 330) resolved *"that a report be prepared outlining a Strategic Plan and timetable for the construction of a Pacific Highway by-pass of the City"*.
- In December 1999 Council received a proposal outlining a timetable and study process for investigation into the future western by-pass of Coffs Harbour. Council resolved at its Engineering Committee Meeting of 10 February 2000 to support the Department of Urban Affairs and Planning's (DUAP) Land use and Pacific Highway By-pass Strategy.
- Council, by resolution 11 May 2000, instructed staff that, at the earliest date initiate discussions with DUAP and Roads and Traffic Authority (RTA) on the Pacific Highway by-pass matter.
- At the Ordinary Council Meeting (Engineering Committee), 8 November 2001, Council put on public record that as for the Pacific Highway consultation, Council did not have a preferred option.
- In the Public Forum addresses, to the Ordinary Meeting (Finance and Administration Committee) 28 February 2002, a representative from the Western Alliance Group addressed Council on the Pacific Highway by-pass. The Mayor advised that a meeting with the representatives would be held.
- Council determined, at the Ordinary Meeting (Planning Environment and Development) 9 May 2002 to have discussions with the Steering Committee and their consultant about the proposals of the Pacific Highway By-pass Study. Council, after these discussions would commission an appropriate consultant to advise on the most appropriate option to achieve the most sustainable outcome for the Coffs Harbour community.
- Council commissioned a peer review of the Pacific Highway Planning Strategy. This peer review addressed by-pass options of:
 - Inner Corridor
 - Central Corridor
 - Outer Corridor
 - Far-Western Corridor
 - "People's Choice" Corridor (see map).
- As a result of the Peer Review, Council resolved at its Ordinary Meeting (Economic and Community Enterprises) 26 September 2002, that:
 - "(i) A strategic environmental constraints map be prepared for the Southern Investigation Area*
 - (ii) Clearer communication with Community Focus Groups (CFG), general community and stakeholders be undertaken*

- (iii) Clarification of the roles of the Project Team and CFG members; with a review of the CFG charter to provide a closer link between the Steering Community and CFGs*
 - (iv) Steering Committee provide an enhanced communication program to the wider community*
 - (v) Additional investigations of social, economic, air and noise impacts be undertaken*
 - (vi) Request the Highway Planning Strategy Steering Committee to review the findings of the Peer Review."*
- Councillor Bill Wood reported to 10 October 2002 that the Steering Committee was able to reduce the options for the Coffs Harbour section to the inner corridor and upgrading the existing highway.
 - Council endorsed 3 July 2003 City Business Units an expanded Community Engagement Process to assist Council to determine a position on the best strategy/option for the local community.
 - During July-September 2003 Council held a series of Pacific Highway Planning Strategy Forums with the Coffs Harbour community. The result of these forums was adoption of a set of 11 key objectives to use in assessing Pacific Highway Route options.
 - "1. To have short-term amelioration of noise/safety issues addressed within 2 years.*
 - 2. To have the Pacific Highway Planning Strategy considered as a single project.*
 - 3. To ensure the impacts of options for upgrading the existing highway through urban areas are fully considered.*
 - 4. To ensure the design development phase and ongoing maintenance integrates best practice noise mitigation measures at the source rather than the receiving end.*
 - 5. To achieve the highest possible visual amenity for the highway and surrounding areas.*
 - 6. To ensure the Pacific Highway Planning Strategy complements and connects with the City's local transport.*
 - 7. To achieve adequate compensation for property owners impacted upon by the alignment of the selected route.*
 - 8. To protect prominent ridgelines that provide the green backdrop to the City.*
 - 9. To ensure the Pacific Highway Planning Strategy incorporates the redesign of the existing highway through urban centres that are bypassed.*
 - 10. To ensure any selected route minimises impacts on people/residential areas, agriculture, tourism and environmental values.*
 - 11. To ensure the route maximises potential residential development for the sustainable growth of the City."*

- After participating in the broadened Community Engagement Process, Council formed an opinion that the proposed upgrade of the Pacific Highway failed to achieve the strategic objectives approved by Council. Council sought a "proper" western by-pass.
- Council, at its Ordinary Meeting (City Business Units Committee) on 4 September 2003, resolved:
 - *"That Coffs Harbour City Council on behalf of the community advise the Coffs Harbour Highway Steering Committee and the NSW Government that it does not support the proposed option of upgrading the existing Pacific Highway from England's Road to Sapphire of the Highway Planning Strategy.*
 - *That Coffs Harbour City Council on behalf of the community advise the Coffs Harbour Highway Steering Committee and the NSW Government that it does not support the proposed option known as the "Inner Corridor" of the Highway Planning Strategy.*
 - *That Coffs Harbour City Council on behalf of the community advise the Coffs Harbour Highway Steering Committee and the NSW Government that it does not support the proposed option of upgrading the Pacific Highway through the township of Woolgoolga and also known as Option D of the Highway Planning Strategy for the Sapphire to Arrawarra section.*
 - *That Coffs Harbour City Council on behalf of the community advise the Coffs Harbour Highway Steering Committee and the NSW Government that it does not support the proposed option of the deviation behind Woolgoolga also known as Option C of the Highway Planning Strategy for the Sapphire to Arrawarra section.*
 - *That Coffs Harbour City Council on behalf of the community advise the Coffs Harbour Highway Steering Committee and the NSW Government that it does not support the proposed options of the deviation behind Woolgoolga also known as Option B1 and B2 of the Highway Planning Strategy for the Sapphire to Arrawarra section."*
- Council, at a Special Meeting on 29 October 2003, resolved to adopt a corridor for a by-pass. Council prepared a map and this became Council's preferred corridor option for the Pacific Highway by-pass. This option was duly forwarded to the RTA (see attached).
- As a result of Council adopting an option, thus a preference for a corridor other than the ones preferred by the Steering Committee (RTA, Department of Infrastructure, Planning and Natural Resources (DIPNR) and Coffs Harbour City Council), Council became a disbanded partner in the process. Council were not involved in "decision making" from February 2004.
- The RTA and DIPNR, following termination of the Steering Committee in February 2004, released a community update identifying their Highway options for the southern and northern sections of the study area.
- Council sought several meetings with the RTA to discuss relevant issues and potential impacts of the various identified Highway options. Council stressed the impacts from a triple bottom line perspective i.e. how it would impact on the community socially, environmentally and economically.

- At 11.00am on Tuesday, 7 December 2004 the RTA, through a media conference, released its "Preferred Route" for the Coffs Harbour Highway Planning Strategy. The preferred options announced would have major impacts.
- Council at its Ordinary Meeting (Planning Environment and Development Committee) on 16 December 2004 responded to the RTA's announcement by issuing the following resolution:

"That Council:

1. *Express strong dissatisfaction with the Preferred Route Options announced by the Roads and Traffic Authority for the Coffs Harbour Pacific Highway Planning Strategy and that Council seek a commitment from the State Government for a future far Western By-pass of the Coffs Harbour area in the long term.*
2. *Lodge a formal objection to the Minister for Roads and the Minister for Infrastructure Planning on the process followed by the Roads and Traffic Authority following the recommendations of the Coffs Harbour Highway Planning Strategy Value Management workshop.*
3. *As a matter of extreme importance, having regard to the unintended consequence of the Chinderah by-pass and for the safety and amenity of Coffs Harbour and all North Coast residents, the Roads and Traffic Authority forthwith give:*
 - a) *A commitment from the Minister for Roads to immediate funding for completion of the Hogbin Drive Extension as a result of the Pacific Highway route announcement.*
 - b) *A commitment from the Minister for Roads for consideration of a fuel rebate or subsidy system or any other measures, including rail, to encourage heavy vehicle operators to use the New England Highway.*
4. *Should the Roads & Traffic Authority continue with its preferred option as a short term solution to Pacific Highway traffic management in order to meet the road safety and amenity needs of the existing community, and to allow the City to grow in accordance with the Coffs Harbour Urban Development Strategy, then it should only be subject to satisfactory resolution of the following issues:*
 - i. *A commitment from the Minister for Roads to abandonment of the IS1 option in favour of the IS2 option.*
 - ii. *A commitment from the Minister for Roads for commencement of the Pacific Highway Coffs Harbour deviation works within a five year timeline.*
 - iii. *A commitment from the Minister for Roads to further negotiation with the Roads and Traffic Authority on property impacts of Option E.*
 - iv. *A commitment from the Minister for Roads to inclusion of grade separated interchanges on the IS2 and IN2 route options at North Boambee Road and at Mastracolas Road respectively.*
 - v. *A commitment from the Minister for Roads to a program which offers acquisition of land effected by the preferred Pacific Highway route immediately upon rezoning of the land.*

- vi. *A commitment from the Minister for Roads to a program of works on the Pacific Highway north of Coffs Harbour which addresses existing safety issues and provides improvements to the existing Highway pending completion of the Highway upgrade.*
 - vii. *A commitment from the Minister for Roads to provision of a local road/service road parallel to the Pacific Highway where possible in the Korora to Hearne's Lake Road section of proposed upgrade.*
 - viii. *A commitment from the Minister for Roads to funding for completion of the Northern Beaches Cycleway project as part of the Pacific Highway upgrade program.*
 - ix. *A commitment from the Minister for Roads to funding for the re-planning of North Boambee Valley and the West Coffs future investigation area.*
 - x. *A commitment from the Minister for Roads to inclusion in costing for the preferred options, funding for upgrade of North Boambee Road, Mastracolas Road and Coramba Road.*
 - xi. *A review of the need and location of proposed water reservoirs in West Coffs and South Woolgoolga.*
 - xii. *Detail design for the IN2 option to include consideration of the proposed West Coffs detention basins.*
 - xiii. *A commitment from the Minister for Roads to a higher standard of noise impact assessment for reconstruction of the Pacific Highway in the existing Highway corridor and all feeder roads.*
 - xiv. *A commitment from the Minister for Roads to a detailed urban design review of the Coffs Harbour Regional Waste Facility area taking into account visual impacts from the Highway Deviation to the facility and compensation for impact upon the facility.*
 - xv. *A commitment from the Minister for Roads to funding for the implementation of urban design measures along the Highway in the Coffs Harbour and Woolgoolga City Centres and at deviation points from the existing Highway."*
- On 23 December 2004, Council wrote to the then NSW Minister for Roads, The Hon. Carl Scully MP and indicated it did not support the RTA's nominated options after careful review and consideration of the effect of the options on the Coffs Harbour community. The letter included the resolution as shown above.
 - As no response came from the Minister's office, with the change in Portfolios and The Hon. M Costa MCC becoming the Minister for Roads, a new letter was issued from Council on 4 April 2005. This letter summarised the previous one issued to the former Minister in December 2004.
 - Council representatives met with the Minister for Roads on 6 April 2005, seeking commitment from the State Government to an immediate start to the Bonville Deviation and that previous representations to the RTA, requesting reduction in speed limits along the Pacific Highway had not been supported.

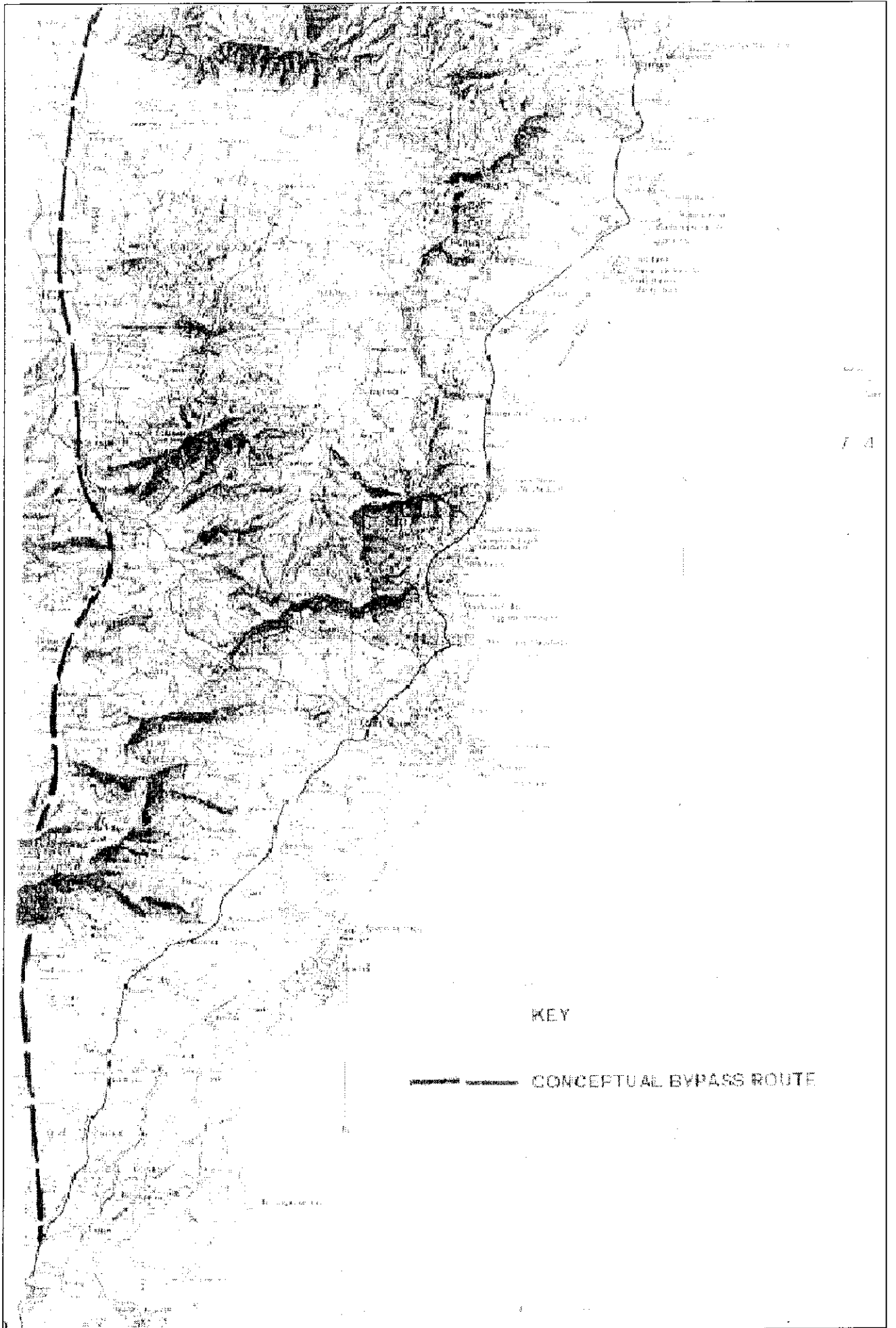
- On 7 July 2005 council noted 28 June letter from the Minister of Roads and resolved that:

- "1. Council note the letter, dated 28 June 2005, from the Minister for Roads.*
- 2. Council ask the Roads and Traffic Authority (RTA) to install speed cameras on the highway in the Pine Creek area, and in the Sapphire to Woolgoolga area in an endeavour to enforce speed restrictions.*
- 3. Council ask the RTA to install Red Light Cameras on traffic lights in Coffs Harbour to assist in encouraging all road users to obey traffic lights, even late at night.*
- 4. Council seek reduction of maximum highway speed limits to 80 kph on all the Pacific Highway between Woolgoolga and Pine Creek.*
- 5. Council ask the RTA to place temporary barricades on dangerous sections of the highway until such time as a decision and implementation of permanent centre line barriers can take place.*
- 6. Council seek a response from the RTA on investigations into the installation of centre line barriers (wire rope fencing) on critical sections of the Pacific Highway.*
- 7. Council seek as a matter of urgency commencement of construction of the Bonville Deviation project by the State Government.*
- 8. Council seek a meeting with the RTA to further investigate other short-term treatments available to reduce the likelihood and severity of road crashes."*

- The Northern Rivers Regional Organisation of Council's (NOROC) held a Pacific Highway summit at Ballina in May 2005. A taskforce, including all Councils from Newcastle to the Queensland border together with the NRMA issued the following statement:

- "1. That the Taskforce repeats its call for immediate additional funding from both the State and Federal Governments to ensure that the Pacific Highway is upgraded to a dual carriageway between Newcastle and the Queensland Border within 10 years.*
- 2. That this Pacific Highway Taskforce works closely with tourism, business, community and other key organisations and stakeholders.*
- 3. That the Taskforce develop and put into action a documented and clearly defined strategy, supported by an immediate and extensive public awareness campaign that reflects, demonstrates and supports the community's desire for a Highway upgrade.*
- 4. That the Taskforce lobby the State Government to sign up to the Federal Government's road funding package, Auslink, and that the State and Federal Governments be requested to commit to a new funding agreement that sees the completion of the Highway within 10 years.*
- 5. That the Pacific Highway Taskforce lobby State and Federal Governments to generate public discussion about viable funding mechanisms such as toll ways or infrastructure bonds as a means of funding completion of the upgrade within 10 years.*

6. *That a working group be established, including representatives from each Regional Organisation of Councils and NRMA Motoring & Services. The working group will undertake research, analysis and provide advice on priorities and strategies to achieve dual carriageway.*
 7. *The working group identifies short-term safety measures to improve the safety of the Highway until the dual carriageway is completed."*
- Council noted the outcome of the summit and endorsed its aims.
 - A second NOROC summit was held in Port Macquarie on 9 September 2005, the outcomes of that meeting were also endorsed by Council.



KEY

————— CONCEPTUAL BYPASS ROUTE

Conrad Wagner

