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4 November 2024

Alex Gosper
ACEREZ

Via email to: alex.gosper@acerez-acjv.com.au
alex.wilson@acerez-acjv.com.au

Dear Mr Gosper

Warrumbungle Shire Council Submission in Response to the CWO REZ Traffic and Transport Management Plan

Thank you for the opportunity to provide comments on the CWO REZ Traffic and Transport Management Plan.

From the view of Warrumbungle Shire Council staff the Plan is generally supported, however there are items of concern continuing from Council's submissions on the SSI Major Project approval. Key among these are that the Plan completely avoids discussion of the effect of project traffic on pavement life **reduction** on Council-controlled local roads. Pavement impacts need to be investigated and modelled in accordance with Austroads best practice. If the project does not do this it runs a risk of widespread pavement failures and significant degradation of service levels, e.g., routes unable to remain open in all weather conditions, increased reactive maintenance burden for ACEREZ, emergent safety hazards in moderate to high speed locations, unacceptable ride quality and wear and tear on vehicles, negative community reputation impacts, and so on.

We note the Crown and its contractors may benefit from certain exemptions from Roads Act Section 138 approval powers of Council, and Council staff will continue to work with ACEREZ cooperatively and efficiently in the spirit of the law. As a precaution we also note however that the Crown does not benefit like Council does (as the roads authority) from certain statutory powers and protections under the Roads Act. We submit that it is in ACEREZ's best interests to continue to genuinely engage with Council on a merits basis for all aspects of the work pertaining to its public roads, to share in mitigating the many potential risks and maximise the benefits of this project for the Central West Orana community.

Comments

1. **Section 2.1.1 Guidelines:** insert AUSTROADS Guide to Pavement Technology (AGPT). The project has expressly identified pavement upgrades will occur and its designers are clearly already utilising Austroads AGPT in

the drawing packages for each road segment, as it describes Australian best practice pavement design methodology.

2. **Section 3.1.1 Traffic and Transport Liaison Group:** the proposed TTLG may be a valuable consultation and coordination channel for community organisation reps, however the number of (all developer) meetings required to bring about the broader REZ is becoming significant and should be minimised and targeted for efficacy. The format, frequency and invitee list should be piloted before a regular monthly meeting is committed to as variations to these and/or sub-groupings of attendees may become more relevant as the project progresses. Note: such community forums do not relieve the need for EnergyCo and ACEREZ to separately formally consult and/or submit documents for approval of Council where required under the Minister's SSI conditions.

3. **Section 5.3 Workers' Accommodation**: As part of reviewing the Merotherie Transport Strategy, Warrumbungle Shire Council previously requested a copy of the ***Temporary Workers' Accommodation Strategy*** which was circulated to Mid Western Regional Council. Please provide.

4. **Section 5.4 worker parking**: high-level quantitative analyses of parking demand versus available parking area onsite should be provided for each major or highly constrained site compound, offsite parking area (e.g. shuttle bus stops) or work areas. One objective is to ensure parking is not required in public road reserves so pedestrians and equipment are kept separate from moderate to high-speed traffic so far as is practicable.

5. **Section 6 Road Upgrades intro** paragraph: mentions the impacts of traffic entering and exiting site, and accommodating the size and weight of components. But it does not address the significant project-wide risk of light and heavy vehicles impacting on public road pavement material durability, wear and tear. These impacts will result in road service level degradation, through pavement failures including loss of gravel, potholes, corrugations, ravelling and cracking, etc. The most cost-effective solution is proactive upgrading and preventive maintenance by the project during the construction phase so the road pavements are fit for the purpose of the design traffic upfront. The 'act later' alternative option is more expensive reactive maintenance (patching) in the years to come, which also poses schedule and liability risks for ACEREZ if roads become unserviceable. Council has estimated as a result of vehicles from this project alone the future maintenance bill may be in the tens of millions of dollars for more than 1,000,000 standard axle load units (ESAs). Add to this figure the impact of several other major project activities which each pose a similar magnitude of impacts along the same routes. See also comments at Section 7.1 below as the dilapidation assessment is a key part of a coherent strategy for this risk topic.

6. **Table 6-1 Road Upgrades:** this table appears to simply repeat the Minister's SSI Conditions ***Appendix 4 Traffic and Transport Table 5***. This is no longer at sufficient depth of detail. It was a key contention of EnergyCo during the EIS and Amendment Report Phases that strategic analysis of road upgrades required across the public road network could only be completed after project approval, with development of these plans and strategies. The project is currently vulnerable to some widespread road network risks which are neither expressly identified or controlled for.

The Table 6-1 has not identified the following Warrumbungle Shire-controlled roads which the project documentation already shows will be significantly impacted by project light and heavy vehicle traffic (see the Transport Plan Appendix B maps), and WSC requests that:

- The proposed strategic-level approach to treatments for each road segment and intersection should be expressly shown at this table and discussed in the Plan, OR
- Specific roads should be expressly excluded from the permitted haulage and commuter routes the project may use, OR
- The Plan should identify which subsequent documents will contain these details (e.g. the relevant subordinate Strategy) for Council consultation in due course.

The likely or potentially impacted roads which are not shown in Table 6-1 include:

a) Dapper Road (off Spring Ridge Road) despite it being at the key junction with the Elong Elong Energy Hub and a key route to the western transmission line.
b) Sandy Creek Road
c) Bald Hill Road
d) Laheys Creek Road (the highway intersection is mentioned but not the road segment)
e) Brooklyn Road
f) Spir Road (which records show is, and shall remain, a road that is not Council's responsibility to maintain)
g) Lincoln Road (Avonside N Road)
h) Avonside Road
i) Tucklan Road (the highway intersection is mentioned)
j) Barneys Reef Road (between Castlereagh Hwy and Birriwa Bus Route)
k) Birriwa Bus Route N
l) Blue Springs Road (the highway intersection is mentioned)
m) Ross Crossing Road (South / North) (which as for Spir Road, shall not become Council's responsibility to maintain)
n) Cliffdale Road
o) Turill-Uarbry Road

- **Section 7.1 dilapidation surveys:** ACEREZ mentioned in the 31 October 2024 meeting with Council that dilapidation survey imaging was already in progress or complete despite this being the first chance for Council to review this plan. A plan should specifically list which Council road segments will be within the scope of the survey – this Plan generally refers to a subset of the construction routes mapped at Appendix B which is ambiguous as per the item above.

- **7.1 (cont.):** Traditional video evidence is important, however with increased availability of GIS data technology and automation (e.g. machine learning) Council generally requires presentation of summary dilapidation survey data from developers using geospatial layers, and to meet the following:

  a) For road carriageways, photographs are to be taken at regular chainages not greater than every 20m and in each direction of travel. Specific photos shall be provided for all other main assets, asset elements, and any defects on Council-controlled land around the site of the works. Photographs are to clearly show the location (coordinates), categories and details of all existing defects.

Photographs are to be georeferenced or otherwise organised into an open-access file or database that quickly allows the relevant photo to be identified from spatial references and viewed.

b) Inspect (non-destructively unless approved otherwise) and provide evidence of internal condition of all assets and main asset elements including but not limited to carriageway wearing courses in each direction, bridge deck, bridge abutments, piers and other structural elements, culverts, pits, pipes where they are within the likely zone of influence of construction activities.

c) For jobs larger or more complex than upgrading a 200m long section of road, or if otherwise specified by Council, provide separated geospatial info system (GIS) layers in a common native GIS data format recording:
    - The project's coordinate reference system (e.g. control line and chainage marks),
    - the presence and condition of each category of main asset elements,
    - locations and types of defects,
    - locations and labels of photos for viewing, and
    - information must be provided to Council electronically and in a format Council can control in perpetuity, by physical media or for download. Access shall not be limited to a proprietary portal or cloud database.

- **7.1 (cont.) and 7.1.1 maintenance and repair:** additionally, regarding the remaining effective pavement life, it is not sufficient to only undertake maintenance and repairs as stated where '*dilapidation surveys identify that a local road has been damaged by the development*'. Council notes many of its roads historically are designed, constructed and maintained only to cater for very low traffic between 20 and ~150 vehicles per day, and a low percentage being heavy vehicles, so may have little or no substantial gravel material underlying the thin base / wearing course.

Traditional visual dilapidation surveys have minimal ability to show or capture the effective remaining pavement life in terms of standard axle repetition load units (ESAs). As the lower 'invisible' pavement layers wear out, remaining effective pavement life is depleted and widespread failures are expected as per Austroads guidance. This poses a significant risk for ACEREZ keeping these roads serviceable for the project traffic given they are historically not designed or maintained by Council to cater for such significant traffic volumes.

In keeping with the 'no worse than pre-existing' principle, ACEREZ is to upgrade or rehabilitate pavements as part of the construction phase to cater for its full project traffic loads. We note ACEREZ is already planning to upgrade pavements due to widening or changes in profile above or below existing surface levels. A combination of quantitative data should be collected and pavement durability modelling done to determine what is the 'pre-existing' ESA design life expectancy level the roads are to be returned to, potentially including (as advised by expert pavement geotechnical engineers):

a) Representative deflection samples at randomised locations (e.g. deflectograph and/or Benkelmann beams),

b) Laser profilometer to enable comparison of changes in surface wearing course material (losses) and ride quality under high traffic, and/or
c) Test pits and bore logs to ascertain existing pavement qualities.

An investigation outline should be provided to Council for concurrence to avoid disagreements later.

- **7.1 (cont.) dilapidation survey frequency:** Clear commitments from ACEREZ are sought as to the maintenance regime it will undertake on Council public roads for the duration of the construction phase, including clear identification of road segments. Wherever ACEREZ is responsible for ongoing maintenance of roads during the construction phase, and restoration at the end of construction to 'no worse than pre-existing condition', Council staff are amenable to waiving a need for annual dilapidation surveys being conducted by ACEREZ on WSC-controlled roads – except in the areas of road which are subject to flood inundation, as these should be documented annually or after each inundation event. Pre-commencement and post-construction survey milestones may be sufficient for non-flooding road segments.

- **7.1.1 Maintenance and repair:** Related to above, the following thresholds for action are unacceptable and poses significant risks to EnergyCo and ACEREZ of third party liability claims: '*Should a road become unusable to the public and road safety is compromised by the damage, the project will prioritise works to repair the road.*' The project is required to continuously monitor and maintain the roads under active use at 'acceptable' service levels throughout the construction phase (or make in kind financial arrangements for Council to undertake maintenance), and restore the pre-existing service level (or better) upon completion, and any emergent hazards during the construction phase (as a result of project traffic) need to be rectified promptly by ACEREZ (to Council's satisfaction as the roads authority) to avoid safety incidents.

- **7.3.1 Shuttles:** services to/from Sydney are welcome. However, there is a need for commuter shuttles between the accommodation camps and key sites (and this is more critical from a peak hourly volumes viewpoint). The strategy to achieve this 'so far as is reasonably practicable' should be explicit including circumstances where it should and should not be used, and a 'high level' quantitative analysis to improve capacity planning. It is accepted it may not be practicable for certain work teams along a linear alignment.

- **7.3.2 Carpooling:** does not explain how private vehicle use will occur on site, what activities are appropriate versus discouraged (considering a high proportion of vehicles being used as tools of trade, etc.), and aspirational targets for car-pool incentivisation where it is practicable to do so, noting the significant worker safety benefits by minimising driver-kilometres travelled by the workforce (as well as general road safety risk reductions this is expected to reduce fatigue, alcohol and drug related incident risks).

Parking within Council public road reserves shall generally be prohibited for safety reasons (current wording is 'instructed to avoid') for any site based works. For example, only roadside inspections or small necessary work zones should be exempted from this rule. Any permitted roadside works would generally need safety controls identified under a TCP or TGS or similar.

- **7.4 Road Occupancy and/or 7.4.3 Traffic control signage**: Insert a statement to the effect that use or installation of traffic control devices such as regulatory signage, barriers or bollards within local roads or classified Regional roads require Roads Act Section 87 approval to be obtained from Council, whether temporary or permanent.

- **7.4.5 Stringing**: State roads are mentioned. Refer to the local road locations also involved in each transmission line crossing. How long will traffic experience delays on local roads if hurdles will not necessarily be used as for State roads? Traffic control in connection with stringing also requires Council Section 87 approval (Traffic Guidance Scheme / TGS).

- **7.5.7 Scheduling:** Should include consideration for school buses (highlight routes) in consultation with bus providers.

If you have any queries regarding the abovementioned matters please don't hesitate to contact the undersigned.

Yours sincerely

LEEANNE RYAN
ACTING GENERAL MANAGER