

WOLLAR PROGRESS ASSOCIATION

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SUBMISSION of OBJECTION R040-17 Bylong Coal Project

Wollar Progress Association (the Association) continues to object to the proposed Bylong Coal Mine because the impacts on the environment, heritage and community cannot be adequately mitigated. The increase in mine traffic on Wollar Road is a key concern.

1. Summary

The Department of Planning and Environment (DPE) has identified Wollar Road as the main route for 80% of all traffic movements to Bylong Mine, including all oversized-overmass vehicles (volume and nature not yet identified). Recommended Condition 53 restricts heavy vehicle movements on Bylong Valley Way and Ulan Wollar Road.

The condition of Wollar Road to the west of Wollar is very poor with a higher than average crash history. Previous assessments have identified this road as unsuitable for mine traffic. DPE recommends that KEPCO be responsible for funding the necessary road safety upgrades. Road safety upgrades must be conducted prior to increased use.

Funding arrangements with Mid-Western Regional Council (MWRC) have yet to be finalised. DPE has recommended this to be concluded within a post approval Traffic Management Plan. It is important that this information is available prior to approval.

Wollar Road is the main route for local residents travelling to Mudgee and is a popular tourist route. Road safety in the region has become a critical issue with the rapid expansion of mining projects over the last 10 years.

The Association strongly objects to the DPE proposal to leave finalisation of funding for upgrade roadworks on Wollar Road until after the approval of Bylong Mine.

Recommendation: That funding required for remediation of Wollar Road be finalised before determination. Safety upgrade works must be completed before construction can commence at Bylong Mine, under conditions, if approved.

2. Background

The Wollar community has been severely impacted by the ongoing expansion of the Wilpinjong Coal Mine. The loss of private property owners, neighbours and social fabric in the Wollar-Bylong district has been significant and has not been adequately assessed or taken into consideration as a cumulative impact.

Remaining local people in the Wollar district are now socially isolated and economically disadvantaged through the loss of local services. This situation is further exacerbated by the Bylong Mine proposal and the hollowing out of the Bylong community.

A key outcome of these social impacts is that Wollar district residents now have to travel to Mudgee more often for basic services. The loss of local mechanic, health clinic, church services, rural and hardware supplies, fresh produce and fewer postal deliveries requires people to travel the Wollar Road on a more regular basis.

The proposal that Wollar Road is to be the main route for oversized-overmass vehicles and the majority of construction and operational vehicle movements for Bylong Mine is putting Wollar resident's road safety at greater risk and also tourists who use this route.

This submission will concentrate on the condition of Wollar Road, particularly through the Munghorn Gap Nature Reserve and the work required to upgrade the road to a safe standard.

3. Route Assessment Study (RAS) 2006

A requirement of the approval of Wilpinjong Coal Mine (Condition 4, Appendix 2 of Project Approval (05-0021) was to undertake a Route Assessment Study that included a Road Safety Audit and a Road Condition Audit. This was conducted by J. Wyndham Prince Pty Ltd in 2006.

Based on the investigations undertaken, the RAS concluded:

- The Wollar Road pavement is generally in poor condition and would require massive remediation and reconstruction to cope with the Project related traffic.
- Wollar Road should not be utilised as the main access road to the Project during the construction period.

The objective of the RAS was "*to identify the most appropriate traffic route for both construction traffic (including oversize-overmass vehicles) and operational traffic to and from the Wilpinjong Coal Project*" and included an assessment of:

- traffic flows;
- road safety and signage;
- pavement conditions; and
- structural integrity of bridges, causeways and culverts.

The RAS described the road hierarchy form and function as: '*Wollar Road (Main Road 208) is a designated tourist drive consisting of a two lane rural road providing direct access between Ulan Road and Wollar. The section being assessed is 33 kilometres (km) long between Ulan Road and the currently approved Project access road. The section (20.3 to 30.5 km) of winding road through the Munghorn Gap Nature Reserve is approximately 10.2 km long.*'¹

Following the RAS and in consultation with MWRC, the majority of construction traffic generated by the Project has utilised the Ulan Road and Ulan-Wollar Road (rather than the Ulan Road and the Wollar Road) to access the Project.²

The Association is concerned that there has not been a major upgrade of Wollar Road between Wollar and Mudgee since the 2006 RAS was conducted. While the road has now been designated a B-double route, there has been very little investment in improving pavement condition or safety risks.

Increased heavy vehicle movements on Wollar Road between Wollar and Mudgee has significantly increased risks to road safety and caused deterioration of the road surface.

The Association considers that many of the same problems identified in the 2006 RAS still exist on the Wollar Road west of Wollar. These include:

- Intersection Performance

Turning lane facilities at intersections and driveways is generally limited or non-existent. Consequently left turns are either made from the through lane or over adjacent gravel or grass shoulders. At most intersections, traffic avoiding right turn vehicles utilise unformed shoulders as a slip lane.

- Alignments & Design Speed

A speed limit heading north-east from Ulan Road along Wollar Road has not been specified, accordingly 100 kilometres per hour (km/hr) maximum limit is assumed. Although the road horizontal and vertical alignment geometry appears to meet 100 km/hr design speed there are sections where stopping sight distance and free travel speed is limited by a combination of horizontal curves, intersections, driveways, causeways, adjacent heavy timber and overhang, high grass road verges and vertical crests.

- Road Cross Section

The road cross section is generally inconsistent with varying batter slopes, lane, shoulder, table drains and clear zone widths. Road shoulders have been constructed from various materials. Some shoulders are substituted by grass verges. Shoulders are noticeably narrow through the Munghorn Gap Nature Reserve area.

¹ Prince, J. Wyndham. April 2007. Traffic Impact Assessment p 7

² Wilpinjong Coal, April 2007, Environmental Assessment, Modification 1

- Other issues

Drainage is poor, no lighting, no safety barriers through Munghorn Gap, the length of road is in poor to fair condition, line marking is poor, many overtaking sections commence where sight distance is restricted or poor, signage is poor and inconsistent.

Recommendation: These issues need to be rectified prior to a major increase in daily traffic usage for Bylong Mine including overmass-oversized vehicles.

4. DPE Assessment Report

DPE provides comment on Traffic and Transport in section 6.2 of the Assessment Report. The recommendation to not include a Workers Accommodation Facility (WAF) as part of the project, at the strong insistence of MWRC, will cause greater increase in Bylong Mine related traffic through Wollar Village than was initially assessed.

The identification of Wollar Road as the only available route for overmass-oversized vehicles, as well as most additional construction and operational mine traffic, raises the major issue of road safety and increased traffic hazards that is not adequately addressed in the DPE Assessment Report or the recommended conditions of approval.

The Association raised significant concerns about increased daily traffic through the Wollar Village in previous submissions objecting to the Bylong Mine proposal.

The Assessment Report highlights the Royalties for Regions funding for the sealing of Wollar Road between Wollar and Bylong and notes that a source of funding to undertake necessary works west of Wollar has still not been finalised.

3.1 Traffic Impacts

The DPE Assessment Report notes that the largest relative increase in traffic movements would occur at Wollar. This means that traffic movements would increase significantly through the Wollar Village. The prediction is that traffic between Mudgee and Wollar would increase by 302% during construction and 174% during operation. It does not specify the number of overmass-oversize vehicles using this route through the Munghorn Gap Nature Reserve.

Traffic movements from Wollar to Bylong are predicted to increase by 461% during construction and 266% during Year 9 operations. This traffic, additional to the increase west of Wollar, must pass through the length of Wollar Village on the Wollar-Ulan Road. Either that, or the traffic assessment is an indication of the current increase in traffic through Wollar Village from the west, contradictory to all traffic assessment conducted for the Wilpinjong Mine extension.

All traffic to Wilpinjong, Moolarben and Ulan Mines has been assessed as using the Ulan Road and Ulan-Wollar Road. Traffic movements through the Wollar Village on the

Ulan-Wollar Road have not been adequately assessed for the Bylong Mine proposal or for any other mine expansion in the region.

The difference between percentage traffic movements before and after Wollar on Wollar Road, as predicted by the Bylong Mine assessment and noted in the DPE Assessment Report, has not been clearly explained.

3.2 Heavy and Oversize-mass Vehicles.

The DPE Assessment Report considers that use of the Bylong Valley Way east and south of Bylong for large vehicles is constrained due to tight corner and grades. A road safety risk has been identified as large vehicles having to straddle both lanes.

The Association is concerned that sections of the preferred route through Wollar Road have a similar road safety risk, as highlighted in the 2006 RAS. Narrow stretches of tight corners with limited road easement will cause large vehicles to straddle both lanes and provide no options for oncoming vehicles to pull off the road.

The travel access of 80% of all Bylong Mine related traffic, including heavy and oversize-mass vehicles, will have a major impact on the condition of Wollar Road west of Wollar Village and increase the safety risk of local road users and tourists.

During 2015, a highwall collapse at Moolarben Mine closed the Wollar-Ulan Road for a period of 6 weeks. During this time all Wilpinjong Mine traffic, including heavy vehicles, travelled through Wollar Village and along Wollar Road west to Mudgee. This temporary increase in mine traffic movements caused a significant amount of damage to the road pavement and increased road safety risks. Large cranes and fuel tankers were regular users of the road.

MWRC has only patched some areas of damage and not remediated the worst sections of poor road condition.

It is critical that the poor to fair condition of the Wollar Road west of Wollar is remediated before the significant increase in traffic movements to Bylong Mine can be approved.

3.3 Road Safety

As outlined in the DPE Assessment Report there is a crash cluster on a 3 km stretch through Munghorn Gap Nature Reserve. There have been several recent deaths from road accidents in this area.

MWRC has been unsuccessful in seeking funding through the Royalties for Regions program to carry out the necessary road safety upgrades. These include safety barriers, road widening, pavement rehabilitation, clearing of trees and culvert widening.

The Association considers that the road safety audit conducted by Hanson & Bailey for Parsons Brinkerhoff in June 2016³ is inadequate in regard to identifying key safety risks on Wollar Road west of Wollar.

The site inspection of Wollar Road was conducted at dusk and night-time on Tuesday 31 May 2016 and during the day on Wednesday 1 June 2016. However, the final report only contains photos of conditions taken at night and none of the day light inspection.

The Association considers this road safety audit to be very poor when compared with the detailed analysis provided in the 2006 RAS.

No detailed description of necessary road safety upgrades for Wollar Road have been provided in any of the Traffic Impact Assessments for Bylong Mine. The DPE proposal that Wollar Road through Munghorn Gap Nature Reserve be the main route for 80% of all mine traffic, including all oversize-overmass vehicles, requires detailed analysis of necessary upgrade works.

3.4 Road funding

The DPE Assessment Report has recommended that KEPCO provide funding for the necessary safety upgrade works and states that *'Council and KEPCO are currently negotiating an acceptable contribution towards these upgrades. Based on the outcomes of these negotiations, the Department will recommend a funding contribution prior to determination of the project.'*⁴

However, the recommended conditions of approval contradict this commitment.

Condition 51 Table 16⁵ does not identify a funding contribution to MWRC and leaves the outcome to be included in a post approval Traffic Management Plan. This is unacceptable.

The recommended conditions require road funding of \$40,000 to be paid to Muswellbrook Shire Council prior to commencement of construction.

The Association considers it imperative that adequate funding is required for all safety upgrades of Wollar Road and that this funding is clearly identified in conditions. The necessary remediation work must be carried out prior to the commencement of mine construction, if Bylong Mine is approved. This must be a condition of approval.

It is critical that conditions of approval reflect this important road safety requirement. The Association does not agree with the DPE conclusion that the increase in traffic as a result of the Bylong Mine could be safely accommodated on the local and regional road network.

³ Supplementary Response to Submissions, August 2016, Appendix A Road Safety Audit

⁴ DPE Assessment Report p 109

⁵ Ibid Appendix M, Recommended Conditions, pp 26,27

The Wollar Road through Munghorn Gap Nature Reserve is a very unsafe road and must be upgraded before heavy vehicles can use it on a regular basis.

3.5 Traffic Management Plan

The DPE Assessment Report has recommended that a Traffic Management Plan be prepared in consultation with RMS and Council prior to commencement of the project.

Recommended Condition 55⁶ is inadequate in relation to safety upgrades of Wollar Road (Munghorn Gap) because Table 16 does not specify what this upgrade requires.

The details on volumes and nature of heavy, oversized and/or overmass vehicles on the nominated heavy vehicle access route ie Wollar Road, must be provided prior to the determination of the project.

The recommended conditions do not specify that all safety upgrades must be completed prior to commencement of mine construction. It is critical for this to be a requirement of approval and clearly specified in conditions.

4 Concerns of Roads and Maritime Services (RMS)

The RMS has indicated significant safety issues that need to be addressed prior to determination of the Bylong Mine.

A letter to DPE dated 27 April 2016⁷ notes that the revised *Traffic and Transport Impact Assessment* for Bylong Mine reports existing higher than average crashes on Bylong Valley Way (MR215) and Wollar Road (208). It also highlights known risks associated with mine staff commuting between residences and the mine site both daily and between shift periods.

However, RMS indicates that report fails to provide measurable commitments from the proponent or planned works to address these risks.

The letter states that traffic generated by the mine will significantly increase traffic volumes and change times of travel on public roads that already have a poor crash history.

There is a strong recommendation that the Bylong Mine not be approved until these issues are addressed.

An email to DPE from Andrew McIntyre, RMA Manager of Land Use Assessment, Western Region, dated 3 August 2016⁸ advises that commitments made by the

⁶ Ibid p 28

⁷ Ibid, Appendix D, Further advice on response to submissions, D4

⁸ Ibid, Appendix F, Additional information, F3

proponent are not certain and do not provide solid and measurable commitments to manage driver fatigue and commuter safety.

RMS fails to provide advice on the key issue of planned works to address the known risks including higher than average crash records on Wollar Road in Munghorn Gap Nature Reserve.

Conclusion

The remaining residents of Wollar district have suffered significant cumulative social impacts due to poor planning decisions on the Wilpinjong Mine. The outcome has caused local people to travel more regularly into Mudgee for basic business transactions that were once available in Wollar Village.

DPE has not recognised this issue of their own making.

The main route of travel to Mudgee for Wollar locals and many tourists is Wollar Road through Munghorn Gap Nature Reserve.

Significant increases of mine traffic movements on this route, including heavy vehicles, will increase road safety risks.

The approval of the Bylong Mine cannot be determined until:

1. Funding arrangements for road safety upgrades of Wollar Road (Munghorn Gap) are finalised with all works identified
2. Details on volumes and nature of heavy, oversized and/or overmass vehicles on the nominated heavy vehicle access route, ie Wollar Road, are provided
3. Details of the predicted increase in, and nature of, traffic movements at Wollar Village are provided

If approved, conditions must include the completion of all road safety works prior to commencement of mine construction.

For further information contact 

Yours sincerely



Bev Smiles
Secretary

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