

Refer to CBAG Submission Section 1 Introduction for context and related content

Submission compiled by Craig Murray on behalf of GBAG

EIS REFERENCE	TOPIC	REF #	2019 Refined Concept Design and/or EIS issues	CBAG Submission
EIS Volume 1D - Chapter 26 – Summary of environmental management measure	Construction and vibration impacts	P 26-5	ID NV03 Building condition surveys will be conducted for buildings and other structures within 50 m of vibration generating activities before commencement of construction. A copy of the building condition survey report will be provided to the relevant property owner.	Research has shown and recent road infrastructure project delivery issues demonstrate that building condition surveys need to be conducted for buildings and other potentially fragile structures within 150m of vibration generating activities before commencement of construction. CBAG requests the increase to 150m. This change can identify pre-existing issues and minimise the likelihood of future claims (where cracking may result just from shrink swell impacts).
EIS Volume 1D - Appendix O – Flooding and hydrology assessment	Flooding	Page 71 Or Page 571 of 733 pages combined Appendices N & O	There are several affected properties that are predicted to have design event peak flood level increases around buildings. Actual flood damages may occur if the project results in inundation above the finished floor level where it did not occur previously. Finished floor levels of these properties will be surveyed to determine actionable damage and impacts mitigated, wherever possible, through further	CBAG requests that the design criteria be respecified to ensure no increases eats of the project corridor. Refer Flooding item below also. It is noted that Page 51 (or 550) refers to “Whole of government approach: Through discussions with CHCC and DPIE (Environment, Energy and Science), a whole of government approach would be investigated which considers the relationship between the project and...”. CBAG is of the view that this is the most sensible and practical sentence in Appendix O. However, all this “would be” and similar could be statements along with Page 45 (or 544) “If

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			design refinement during detailed design.	during detailed design construction impacts are predicted to be worse than the developed case flood impacts, mitigation measures will be developed in accordance with the flood plain management objectives and the CFMP.” Are more reasons why CBAG requests the Detailed Design be completed, communicated and assessed ASAPracticable for a Construct Only Contract.
	Noise		Concerns regarding apparent errors in noise testing, assumptions, interpretation and modelling.	CBAG requesting an independent noise audit and for shortcomings identified from the audit to be addressed prior construction commencement. Especially in currently quiet areas. Refer CBAG Submissions in particular 2.2, 2.3, 2.7 Submissions and Section 3 Draft Ministerial Conditions of Approval.
	Detailed Design		Detailed Design and RMS 2018 Preferred Concept Design submissions.	Developed and updated detailed designs, in particular for interchanges, to be communicated to the community for consideration and comment ASAPracticable and for subsequent concerns raised, if any, to be incorporated prior calling for construction tenders. Also, for the still relevant component of the 813 submissions (number noted in EIS) regarding the RMS 2018 Preferred Concept Design, to be properly considered and addressed also prior calling for construction tenders.
	Contract delivery methodology		Construct Only Contract	CBAG requests a Construct Only Contract for the delivery methodology of the project. Not for a Design and Construct Contract, Alliance style,

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				Delivery Partner style, Stewardship and or any other similar style contract. To give the community a higher level of trust that the Final Design (after consultation and agreement with the community) will be the actual design constructed only varied within the “normal” limits of a Construct Only Contract.
	Flooding		Flooding	This project has the capacity, without little analytical design effort and likely no extra cost, to “floodproof” the Coffs Harbour residential areas and Central Business District east of the project corridor. This aspect has been discussed with both TfNSW and Coffs Harbour City Council representatives and it is recognised and considered reasonable that with some increased inundation levels over and above “normal” road design and hydrology impacts permitted upon the western side of the project corridor, which are currently undeveloped and/or rural, the eastern side can be floodproofed.
	Coramba Road interchange.		Coramba Road interchange.	For consideration of an alternate single round-about “donut design” like the design of the Pacific Highway and Oxley Highway interchange near Port Macquarie. This alternative design can reduce the “footprint” of the interchange and increase the distance from residents to the interchange with the associated noise, vibration, urban design and amenity benefits.