

AUSTRALIAN PROPERTY SYNDICATES PTY.LTD.

A.B.N. 56 010 793 245

4th December 2023

To the Department of Planning and Environment
Via the Major Projects Planning Portal

SUBMISSION AGAINST : Sutton Forest Sand Mine Project

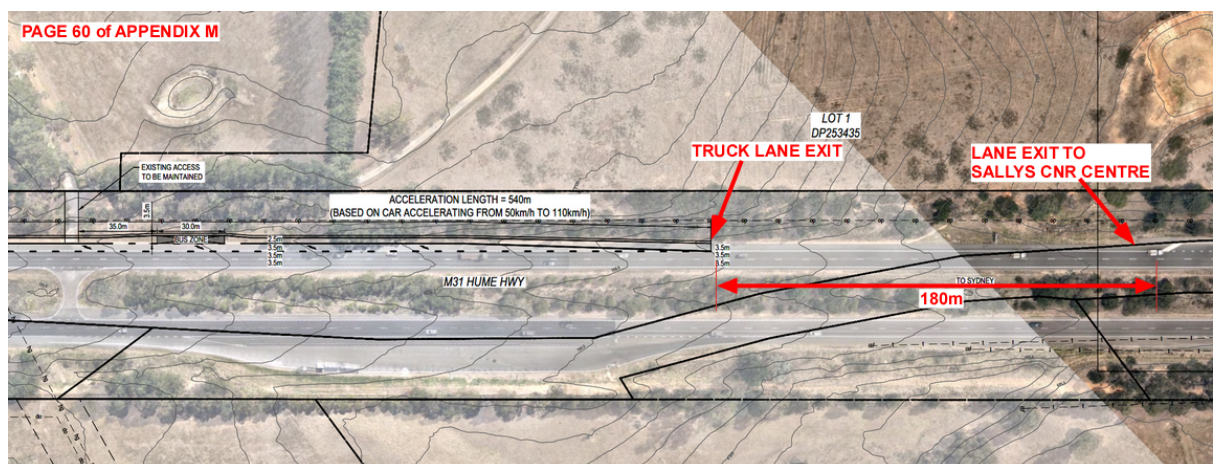
I am writing on behalf (and as one of the owners) of the Sutton Forest Highway Service Centre. Our facility is adjacent the proposed Sand Mine development.

I am writing to vehemently oppose the proposed sand mine, and highlight our grave concerns regarding the potential for dangerous traffic conflicts, the potential unstoppable use of the Highway Service Centre road and bridge network by sand mine trucks, and the corresponding safety risks to users of the Highway service Centre.

These critical issues demand urgent and meticulous evaluation, as they collectively pose significant threats to the safe operation and utility of the established Highway Service Centre and associated infrastructure.

In this objection, I will outline the primary concerns related to highway traffic conflicts, the unintended Highway Service Centre road network and bridge usage, and the safety of individuals and commercial traffic users accessing the Highway service centre.

- 1. Highway Entry/Exit Traffic Conflicts:** Our paramount concern is the anticipated traffic conflicts stemming from the coexistence of heavily laden and long sand trucks departing the proposed mine versus road users trying to exit into the Highway Service Centre. The potential clash of these two major traffic streams, each with distinct speed profiles and merging requirements, poses an imminent threat to safety, traffic flow, and overall road network efficiency.



Key issues raised in the application / Road Safety Audit

- (a) The proponent has proposed a separation distance of only 180m from the end of the sand mine on-ramp to the Highway Service Centre off-ramp. See diagram above.
- (b) Several of the assumptions used in the “Road safety audit” are materially flawed. The audit states that the required acceleration lane length was based on rates of acceleration for a CAR, already travelling at 50kmh to accelerate to 80% of merge speed. NOT A SAND LADEN TRUCK.

Sutton Forest Sand Mine Quarry is proposing to use “22.44 metre long Quin Dog trucks and 25/26 metre long B Double trucks”. There is NO calculation on the acceleration performance of these trucks, fully sand laden, departing the quarry but it is a given that they will not be at car performance levels as they merge into highway traffic after 540m...

THEREFORE, these long heavy vehicles will remain, with a differential lower speed, in the left lane obstructing access to the Highway Service centre exit.

The “Road safety audit” suggests that Highway Service centre bound vehicles will already be in the left lane some 2km prior to the Highway Service Centre exit! This is one of the first fantasies contained in the report. Expect to see cars trying to get past slowly accelerating trucks directly at the Highway Service Centre exit point with weaving and terrible consequences for cars braking to ‘make the exit’ versus slow reactivity heavy trucks.

- (c) There is an error within the body of the “road safety audit” referring to a separation of 230m between the end of the quarry acceleration lane and the Highway Service Centre exit lane, when the plans provided show it is only 180m. Fundamentally this separation is completely insufficient not allowing for reasonable decision time and action needed for the safe exit to a Highway Service Centre for all road users in this high speed environment.
- (d) Traffic Queuing into the Highway Service Centre off ramp peak periods. As noted in our previous submission, during peak periods, the northbound on-ramp traffic backs up before entering the Service Centre (specifically ski season and peak summer holiday periods) onto the Highway exit for vehicles accessing the Service Centre. This is not desirable but it is a fact. Given the mere 180m distance between accelerating traffic entering from the sand mine and decelerating traffic exiting to the Service Centre, serious safety concerns are apparent. Additional pressure from cars trying to manoeuvre around to exit against accelerating trucks would create a lethal situation for motorists just trying to get a big mac during the ski / holiday season.

2. Highway Service Centre Road Network Usage:

The proposal suggests that Southbound trucks leaving the sand quarry would travel an additional 9km (4.5km north + 4.5km south) to the Illawarra Highway offramp to transition from the northbound Hume Highway (quarry egress) to the southbound Hume Highway. This is traffic fantasy number two of the proposal. Truck drivers will seek the quickest route which is via the Sutton Forest Highway Service Centre bridge directly after the Quarry on ramp (180m) and to cross the Highway via the existing bridge. Why would they drive an extra 9 km and 10 minutes ? There is no way to restrict the trucks from using this public road. The proposal is deafeningly silent on this obvious issue and no study on the real world effects of this factor have been undertaken.

- 3. Bridge and road maintenance:** Increased usage of the existing roads and bridge at the Service Centre by heavily laden trucks warrants serious consideration regarding their suitability, structural integrity and maintenance requirements. These assets were not designed for significant heavily laden truck traffic traversing from the northbound Hume Highway to the southbound Hume Highway. The potential for accelerated wear and tear on the bridge and access roads demands meticulous assessment and mitigation strategies to ensure the continued safety and functionality of this dedicated infrastructure.

- 4. Safety of Highway Service Center Users:** As in (3) the proposed sand mine, with its influx of heavily laden trucks, is expected to put huge strain on the Highway Service Centre road network. This would lead to congestion, compromised accessibility, and a diminished experience for genuine users seeking to access Highway Service Centre facilities including fuel, food amenities, and other services.

Ensuring the safety of users at the Highway Service Centre must be a top priority. The convergence of heavy trucks, regular passenger vehicles, and pedestrians within the Service Centre area requires comprehensive planning to mitigate potential hazards, reduce traffic conflicts, and enhance overall safety.

In conclusion, given the obvious risks of Hume highway traffic conflicts, the unstoppable use of the Highway Service Centre road network, and the safety risks for its users, our objections to this proposal cannot be overstated. The sand mine, with its heavy intensive truck traffic, significant environmental impacts and flawed assumptions, threatens to disrupt the existing infrastructure, compromising the safety and convenience of both travelling public and Highway Service Centre users alike.

The long-term vitality and safety of the Sutton Forest Service Centre depends the State Government reconsidering the suitability of this site and rejecting the application for the sand mine proposal.

The sand mine proposal is inconsistent with safe access to the Highway at this location.