

Hillview Hardrock Quarry Project (EXH – 84419206.

Quarry SSD-70557215

Personal submission with OBJECTION on ground of traffic and cumulative effect.

My name is Margarete Ritchie. I am president of a not-for-profit community organisation (Voice of Wallalong and Woodville – VOWW) which has been involved in researching the effects of quarrying on communities and the environment in the local area over the past 30 years. Submissions by VOWW, on behalf of residents, to the Department of Planning against new quarries or expansion of existing quarries have been written for:

- Hanson Brandy Hill Quarry
- Eagleton Quarry
- Booral Seaham Quarry
- Daracon Martins Creek Quarry
- Stone Ridge Quarry
- Karuah South

The reasons for our objections involved, amongst others:

- The destruction of the local environment that in some cases included habitat for vulnerable and endangered species.
- The impact on residents regarding mental and physical health.
- The change to the character and ambience of the local area.
- The impact of the extra haulage truck traffic on residents and the wider community.
- The cumulative effect of quarry haulage on the wider area.

However, this is a personal submission made on behalf of myself and my family with the knowledge gained from the research mentioned above and personal experience.

I live on Brandy Hill Drive 4 kilometres from the Hanson Brandy Hill quarry. I feel the impact of road haulage daily. This community has lived experience of the cumulative impact of both Hanson and Daracon (Martins Creek quarry) using Brandy Hill Drive and Seaham Road to haul quarry product to Williamtown Airport runway expansion in 2014. An estimated 1,200 trucks/day were passing through residential and rural areas to deliver their product.

The cumulative effect of quarrying in general, or of trucks on our roads, has never been addressed or even taken seriously, by the Department of Planning or by the quarry owners.

Most of the quarry products are destined for Sydney, the Central Coast or Newcastle area and therefore the Pacific Highway is the route taken once the trucks have travelled through residential or rural localities. Companies and the Department refer to the highway as being built to cater for heavy haulage but dismiss the need for the trucks needing to access the highway at several intersections. In the case of Hillview and Deep Creek quarries, most haulage vehicles will need to access the highway from The Bucketts Way.

The requirements under SEARs included a *traffic and transport impact assessment, including:*

- *a detailed assessment of potential traffic impacts on the capacity, condition, **safety and efficiency** of the local and State road network (as identified above), including a road **safety audit**;*

- *an assessment of cumulative traffic impacts, having regard to any other proposed developments in the locality;*
- *a description of the measures that would be implemented to mitigate any impacts, including concept plans of any proposed upgrades, developed in consultation with the relevant road ... authorities (if required).*

I do not believe these issues have been adequately addressed and I will outline my reasons in this submission.

I will refer to the report **Traffic and Parking Impact Assessment** written by **McLaren Traffic Engineering and Road Safety Consultants** on behalf of Hillview Quarry. This report, written 2024, relies on data collected in 2023 and other historic data from 2015-2018. Assumptions have been made as to the total traffic on the highway with calculations that may not match contemporary reality.

The proposed development results in a low increase to the surrounding traffic network volume. Although when considered as part of a cumulative assessment with the Deep Creek Quarry, the combined impacts of both developments result in a LoS "D" for the intersection of The Bucketts Way / Pacific Highway during the worst case assessed peak hours of 9:00am to 10:00am and 2:45pm to 3:45pm.

The data collected has made no mention of the traffic that is generated during holiday times along the Bucketts Way and the impact it has on the intersection with the Pacific Highway.

The added quarry traffic would exacerbate the long delays already experienced at the highway intersection. At holiday times and long weekends, the queues along The Bucketts Way can be several kms long waiting to turn either left or right.

This represents an increase in average delay of 4 seconds, with LoS "C" representing a satisfactory operation.

I can assure you from experience that the delays to turn onto the Pacific Highway are much greater than 4 seconds. Nowhere in this report are traffic counts done on busier times on the road network. All readings are taken on Monday or Wednesday. Fridays may be busier on the highway as traffic heads north for weekend recreation.

The cumulative effect of both Deep Creek and Hillview quarries on this traffic scenario would add frustration and danger to this intersection now, not just at some future date.

This results in an acceptable operation, although the intersection is approaching its operating capacity. Based upon background traffic growth to 2033, without development traffic the intersection of Pacific Highway / The Bucketts Way is expected to operate with worst turning movement of LoS "F" and LoS "C" during the AM (9:00am to 10:00am) and PM (2:45pm to 3:45pm) peak hour periods respectively. This worst turning movement relates to the right turn out of The Bucketts Way. LoS "F" indicates that the turn movement is failing and is above the capacity at which the intersection can handle.

This report timeline gives the 10yr predictions to 2033. However, this was from data collected in 2023. Therefore, if this proposal is accepted by the Department and without appeal to the IPC, it would be 2026. With the time it takes to establish the quarry being approximately 2 yrs, as stated in this report, the saturation level of the Highway and The Bucketts Way would almost have reached the

FAIL which would be further exacerbated by the haulage traffic from this quarry. Thus, within the first few years of the quarry being fully operational, the safety of the Pacific Highway intersection would be severely compromised and the delays in accessing the highway would be unacceptable.

If this scenario is to be avoided, TfNSW planning would have to be well underway, and construction commenced before 2033. This report does not give any indication of a timeline.

*Increase in traffic flows as a result of background traffic growth make the right turn out onto the Pacific Highway from Buckets Way difficult at peak times (LoS "F"), but there is **an alternative travel route in the event that right turns out of The Bucketts Way are restricted that has been proposed to ameliorate any externalised impacts of the subject development upon this intersection in the future.***

Considering that other roads in the area have restrictions due to heavy haulage guidelines as specified by AustRoads, the alternative travel route has not been outlined.

h) If drivers of heavy vehicles upon attempting to enter the Pacific Highway and the time taken to turn right exceeds a two (2) minute wait time, they are to proceed to turn left onto the Pacific Highway and utilise Tarean Road to undertake a safe U-turn to proceed westbound along the Pacific Highway

The above is a quote from the 'Driver's Code of Conduct'. It is the only time that a left turn onto the highway and then using the Tarean intersection to make a U-turn is mentioned. There is a cumulative impact here as quarry trucks from the Italia Road quarries and the Karuah quarries already use this option as a requirement of their consents. If the Stone Ridge quarry, currently before the IPC is successful in its application, that would be 7 quarries already operational with a potential cumulative impact that has not been addressed and cannot be ignored.

The report mentions that:

*The proposed development results in a small increase to the surrounding traffic network volumes and will not have an adverse impact on major traffic flows **when considered in isolation.***

The cumulative effect of haulage from this quarry proposal and the Deep Creek quarry is not insignificant. Each quarry adds to the traffic count and cannot be taken in isolation. There is a 'tipping point' where safety of all road users must be taken into consideration. Anxiety for the safety of their vehicles and passengers when confronted by numerous heavy haulage vehicles such as the truck and dog configurations, is real for many road users. The quarries are not 'in isolation' but part of a problem that must be addressed. The report also fails to address the cumulative impact of all quarry traffic on the highway between Karuah and Heatherbrae. While TfNSW states that the highway has spare capacity, thousands of haulage trucks/day from the Karuah, Italia Road and Brandy Hill quarries, at peak, adds a degree of danger to all road users. This is the major route north for all other road transport which is already considerable.

There has been no strategic planning for quarries although it is known that there are further reserves of quarry rock in this area. At what stage does 'cumulative impact' become an issue? It has been addressed by communities but ignored by decision makers and quarry operators talk as if they are 'in isolation'. This is not just a road issue but also the cumulative effect on the environment and the character and ambience of an area. Residents do not buy properties to eventually live next door to quarries. Wildlife corridors are declared and then ignored. That is the case for this entire area including land surrounding Deep Creek and the proposed Hillview quarries.

*It should be noted that heavy vehicles cannot utilise Booral Road to travel north as it is not an approved 19m B-Double Route, but they can utilise The Bucketts Way, which an approved B-double route to travel to Stroud. Considering this, **a Driver Code of Conduct outlining haulage routes will be provided to all new drivers in addition to an induction to all heavy vehicle drivers.***

I am a member of the Brandy Hill quarry CCC. The issue of 'drivers code of conduct' is often discussed and very problematic. Company drivers are usually compliant with all regulations; speed limits, engine braking noise, routes taken. This is NOT the case for some haulage contractors. Hanson (now Heidelberg) management rely on complaints from the public that they then investigate. It is up to the public to take note of number plates or other distinguishing features of the offending vehicles, and this is not always possible. The onus should not be on the public to police offences and very difficult for the quarry company to police. With multiple quarries in the area, it can be difficult to isolate which one is at fault. Hanson has stated that once a contract truck driver leaves the quarry, they have little control over their behaviour on the road. Therefore, a code of conduct and induction for some rogue drivers is meaningless and not a solution for this problem.

The Bucketts Way has been provided funding for the upgrade of the road (\$25 million).

However, to date no funding has been forthcoming for upgrade/interchange for The Bucketts Way intersection.

State requirements for quarries includes provision for parking.

The proposal is anticipated to require 25 to 30 staff members for day to day operations.

It is surprising that the report states that no formal car park is required and.... *as is standard for this type of development, staff park informally near stockpile areas, offices, amenity areas and on the side of the internal road.*

Surely this is an occupational health and safety issue. Parking amongst stockpiles would be a risk to the safe operation of the quarry.

Hanson Brandy Hill has a dedicated car park outside of the stockpile area and near the administration buildings. This services the workers as well as visitors to the site. The 6 CCC members use it regularly, yet for this Hillview project, visitors would have to park on the edge of the internal road that serves as the main entrance/exit for haulage vehicles. A danger to any visitors to the site. This must be addressed. It is an issue of occupational health and safety.

If required by Council, a car parking area can be provided on-site accommodating 30 car parking spaces in accordance with AS2890.1:2004 design requirements although this provision is considered unnecessary.

The site is located within a rural environment with no access by public transport, bicycle routes or pedestrian facilities and as a conservative approach one space per staff member will be applied based upon the operation of the site.

This should not be '**if required**' and left up to Council. It must be a requirement that is specified and monitored by the Department.

Again, no mention of visitors to the site. Just parking for employees. It would be a dangerous situation for visitors to park amongst stockpiles or informally along a working quarry road. It would be interesting to get the WorkSafe opinion on employees parking amongst stockpiles of gravel!

From **The NSW Resources Regulator – Guide to Health and Safety at Quarries (2018)**:

- *Develop and implement roads and traffic management plans to control the segregation of vehicles to minimise interactions between heavy and light vehicles, structures and pedestrians.*
- *Roads and other vehicle operating areas can introduce significant hazards at an extractive site*
- *Any vehicle movement can pose significant risks at extractive sites, because of the size of the vehicles used and the working environment.*

The risks are apparent yet; this consultant's report states that other quarries use stockpile areas for worker parking and therefore it must be ok. Government guidelines be damned!

Conclusion.

The SEARs has required the proponent to:

1. *Provide a road safety audit.* No audit has been mentioned and, indeed, road safety has been ignored.
2. *Address cumulative traffic impacts.* No mention of future increase in traffic on the Bucketts Way and the impact haulage traffic will have. The Gloucester/Barrington area is now a key tourist destination. The proponent believes that the quarry works in isolation and therefore does not need to address its haulage impact on other road users. It also seems that the cumulative impact with haulage trucks from Deep Creek is of little consequence. With 27 heavy vehicle trips/peak hour periods for Hillview and a similar number for Deep Creek, that equates to close to one truck/minute using the Pacific Highway intersection. That is a significant number that will be interacting with other road users and seems to have been deemed acceptable.
3. *Provide: a description of the measures that would be implemented to mitigate any impacts, including concept plans of any proposed upgrades, ...*
Other than having diagrams showing the traffic flow at peak hours for both intersections, Maytoms Lane/The Bucketts Way and The Bucketts Way/Pacific Highway, I could not find any description of ways that impacts could be mitigated. Concept plans for the intersection with the Pacific highway has been mentioned briefly as being an issue for TfNSW.
4. *Parking on site has been addressed poorly. It does not comply with standards set by NSW Resources Regulator.*

Whenever I travel north along the Pacific Highway, I dread approaching the intersection with The Bucketts Way. I know how frustrating it is for travellers needing to turn right to access the highway. There is little room for error when crossing 2 lanes of traffic travelling at speed and even more daunting when a truck and trailer is involved.

I urge you to consider this personal submission and consider whether this quarry development is really in the public interest.

Margarete Ritchie.