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QS Reference:

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Lodged via web form at:

http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8704

**OBJECTION TO MOONIMBA BORROW SITE, WOOLGOOLGA TO BALLINA PACIFIC HIGHWAY
UPGRADE PROJECT MODIFICATION 4 – SSI 13-4963**

Quarry Solutions Pty Ltd (Quarry Solutions) owns and operates seven (7) quarries in the Richmond Valley Shire Council and Ballina Shire Council local government areas with a total combined annual extraction volume of 3,546,000 tonnes. We are appointed as a preferred supplier of construction materials to the Woolgoolga to Ballina Pacific Highway Upgrade Project (the project). We have the capability and experience to produce a full range of high quality construction materials sufficient to meet the demand of the project.

Quarry Solutions objects to the proposed modification of the project approval to include a temporary intensification of operations at the Moonimba Borrow Site on the following grounds:

1. Public value

Insufficient evidence is provided to demonstrate that the proposed modification provides improved public value for money in comparison to sourcing the necessary construction materials from existing quarries closer to the alignment of the project.

Section 2.5 of the modification application report states as follows,

“Four borrow sites were identified in the W2B EIS and/or the Submissions/Preferred Infrastructure Report (SPIR) to provide material for the construction of the project. These sites include Lang Hill, Lumley’s Hill, Gibson’s and Eaton’s. Three of the four sites (Lumley’s Hill, Gibson’s and Eaton’s) are unable to provide material to Portion C as the Richmond River Bridge would not be constructed prior to when the material is required.”

This is factually incorrect. At this time, Eaton’s Quarry which we operate can provide the required material to Portion C of the project via the existing alignment of the Pacific Highway. We have previously made representations to RMS and Pacific Complete that modification to the project approval should occur to enable a temporary increase of extraction from Eaton’s Quarry to supply to the project. However, we were advised that such a proposal did not meet probity requirements and would not be fair to other operators or transparent and therefore would not be considered. This is despite Eaton’s Quarry being within the road corridor and identified as a borrow source in the original application. The same also applied to the adjacent Montis Quarry. We are unsure why

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it is now appropriate for the Moonimba Borrow Site to be put forward through this modification process when it was previously inappropriate to progress with the Eaton's and Montis quarries. Section 2.5 of the modification application report also states as follows,

“As the project is publicly funded, Roads and Maritime is committed to providing public value for money for the design, construction and operation of the Woolgoolga to Ballina Pacific Highway Upgrade. Increasing the extraction rate at the site would allow for the reduced unit cost of material due to economies of scale. Other local quarries within the area have been identified as potential alternative sources of material for the project, however they are located further from the project alignment and do not possess the types and quantities of material necessary to fill the deficit of material in Portion C. Sourcing the required material from the Moonimba Borrow Site would reduce the distance travelled by haulage vehicles travelling to and from the alignment which would decrease the potential impacts to the wider local road network, increase safety for local residents, and provide project efficiency.”

This also is factually incorrect. We operate the Gittoes Quarry at Broadwater adjacent to the alignment of the project. This quarry is closer to the project than the Moonimba Borrow Site. It is also more than 40m from a water way, of low ecological and heritage value (being an existing disturbed quarry) and more than 100m from the nearest receiver. Like the Eaton's Quarry, we have also proposed to RMS and Pacific Complete that the project approval should be amended to incorporate the Gittoes Quarry but were advised that such a proposal did not meet probity requirements and would not be fair to other operators or transparent and therefore would not be considered. Gittoes Quarry is closer to Portion C and therefore haulage costs are less than the Moonimba Borrow Site. It would also utilize the existing alignment of the Pacific Highway from the North, spreading the traffic impact across the network rather than concentrating it on the Woodburn-Coraki Road. The Moonimba Borrow Site solution is not of a greater public value than sourcing material from the Gittoes Quarry.

The Eaton's and Montis quarries whilst further from the Portion C of the project would utilize the existing alignment of the Pacific Highway which would more evenly distribute traffic impacts that the proposal to run an additional 300 trucks per day on the Woodburn-Coraki Road. This would have a lesser impact on the local road network and would be safer for the local community.

Our Woodburn Quarry which is approved to extract up to 2,000,000 tonnes per annum is also closer to the project alignment than the Moonimba Borrow Site and haulage rates would be less than from the Moonimba Borrow Site.

On this basis the statement that, ‘sourcing the requirement material from the Moonimba Borrow Site would reduce the distance travelled by haulage vehicles travelling to and from the alignment which would decrease the potential impacts to the wider local road network, increase safety for local residents and provide project efficiency’, is factually incorrect and therefore, it has not been demonstrated that the proposed modification provides public value for money.

The Petersons and Coraki quarries can also supply the required material and being existing operations would have less environmental, traffic and safety impacts compared to the proposed Moonimba Borrow Site.

Accordingly, insufficient evidence has been provided to demonstrate that the Moonimba Borrow Site provides better public value for money than sourcing material from the Eaton's, Montis, Gittoes, Woodburn, Petersons and Coraki quarries and other existing quarries.

2. Traffic noise

The traffic noise impact assessment has relied upon traffic counts conducted in 2014 ignoring truck movements associated with the Coraki Quarry which commenced in late 2016. A revised traffic noise impact assessment should be conducted based on current traffic data. The revised traffic noise impact assessment should be subject to independent peer review prior to assessment by the Department.

3. Traffic impact

The traffic impact assessment also relied on traffic counts conducted in 2014 ignoring truck movements associated with the Coraki Quarry which commenced in late 2016. A revised traffic impact assessment should be conducted based on current traffic data. The revised traffic impact assessment should be subject to independent peer review prior to assessment by the Department.

An additional 300 truck movements per day on the Woodburn-Coraki Road will have a significant impact on the community. The application documentation suggests a maximum of 33 truck movements per hour is anticipated from the Moonimba Quarry. When considered in conjunction with the approved truck movements associated with the Coraki Quarry (31 laden vehicles per hour = a total of 62 truck movements per hour) this equates to 95 truck movements per hour. That is, a truck travelling through the Woodburn-Coraki Road / Pacific Highway intersection approximately every 45 seconds. This does not consider traffic from the Petersons Quarry or other existing heavy vehicle traffic already utilizing the road network. It is unlikely that a truck can move through this intersection every 45 seconds during peak periods. This will result in significant traffic delays at that intersection during the morning peak which coincides with school traffic. Time delays will be significantly increased if the intersection must also be operated under traffic management conditions.

This proposal will have a significant detrimental impact on the community in comparison to sourcing material from other existing quarries north or south of Woodburn. The cumulative impact of the Moonimba Quarry with other truck movements have not been clearly stated in terms that could be easily understood by the community. Furthermore, we are concerned that RMS and Pacific Complete have not fully understood the time delays likely to be experienced by trucks travelling from the Coraki Quarry and the flow on impacts to delivery timeframes to the project and their associated costs. We anticipate that the additional traffic from the Moonimba Quarry will have a significant impact on our capacity to efficiently supply the project and therefore we believe the Moonimba Quarry will have a direct negative impact to the value for money for the public from the project.

4. Works obligations

The proposed modification assumes certain roads works required to be completed for the existing consent (Richmond Valley Council Reference DA2015.0069) will be completed prior to Pacific Complete and its Nominated Contractor commencing operations. For certainty, the same works obligations imposed on DA2015.0069 should be imposed on the proposed modification through conditions of consent by the Department. Furthermore, we have received advice from a qualified traffic engineer that the proposed traffic management measures alone would not be sufficient to

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safely accommodate an additional 300 truck movements per day through the intersection of the Woodburn-Coraki Road and the Pacific Highway. For the safety of the community and road users the intersection should be physically upgraded with a dedicated Right-turn treatment on the Pacific Highway for vehicles turning onto the Woodburn-Coraki Road. This should be completed prior to the commencement of operations by Pacific Complete and its Nominated Contractor at the Moonimba Borrow Site.

5. **Heavy haulage contributions**

Heavy haulage contributions are imposed on all quarries operating in the Richmond Valley Shire Council. It is fair and reasonable that these same contributions are imposed on the Moonimba Borrow Site for consistency and to ensure that the Richmond Valley Shire Council is duly compensated for impacts to its road assets including the Woodburn-Coraki Road.

6. **Truck safety management measures**

Quarry Solutions has implemented leading practice truck and traffic management measures to satisfy the expectations of the community, the Department, Pacific Complete and Roads and Maritime Services (RMS) as part of the project. This includes for example, GPS monitoring devices in trucks and busses travelling along the approved haulage routes as well as a strictly enforced drivers code of conduct, and a detailed traffic management plan. This has been instrumental in maintaining good community relations demonstrating a commitment to work with the community by holding drivers to account for their professional conduct. The modification application suggests that the GPS tracking of haulage vehicles will be 'investigated' by RMS and Pacific Complete. There is no need for investigation. Quarry Solutions have effectively implemented a system which has been accepted by the Department, Richmond Valley Council, RMS and Pacific Complete. Quarry Solutions would be pleased to assist RMS and Pacific Complete to adopt the same system. It is fair and reasonable that these same requirements be required for the Moonimba Borrow Site by the Department.

Conclusion

Quarry Solutions and other existing quarries have the capacity to meet the demands of the project. There is no need for the temporary increase in production from the Moonimba Borrow Site as proposed by RMS and Pacific Complete. Furthermore, insufficient evidence of the public benefit of the proposed modification has been provided when suitable alternative sources are closer to the project and could therefore supply the required materials at a lesser cost and therefore a saving to the public. The true and cumulative impact of an additional 33 truck movements per hour through Woodburn has not been clearly stated in terms that can be understood by the public. Those truck movements will cause delays for vehicles at Woodburn and will have a significant impact on the efficiency of the road network and the capacity for suppliers to deliver material to the project. Accordingly, this will result in additional financial and time costs to the project and therefore will not provide improved public value compared to sourcing material from existing quarries and other sources north and south of Woodburn. On this basis, we request that the proposed modification be rejected.

However, if the Department supports the proposed modification, it is only fair, reasonable and transparent that the same obligations imposed on existing quarries be placed on the Moonimba Borrow Site. This should include the necessary road works obligations to the haulage route including



physical road upgrades, heavy haulage contributions and implementation of leading practice truck safety management measures including GPS monitoring of haulage vehicles.

If you require any further information regarding the above, please do not hesitate to contact me.

Yours sincerely

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