

A significant stated justification for the proposal was to meet the additional demand generated by preparatory work for the Gold Coast Commonwealth Games; this is no longer a relevant consideration. Further, some industry analysis seems to indicate a weakening of building activity in the immediate term, bringing into doubt the existence of a real and pressing need for the proposal. Further quantitative information is required to justify the proposal.

The proposal seeks to modify the existing condition of up to eight vehicle movements per hour to allow for up to 240 heavy vehicle movements per day. The application is made for a daily rather than hourly limit to allow for increased 'flexibility' implying considerable variation around the average; i.e. when demand 'spikes in the morning' (Environmental Assessment report, p11) the movement of trucks is likely to significantly exceed the hourly average of 24 vehicle movements (based on a ten-hour working day). If approved, at the extreme, there would be no constraint on 240 vehicle movements in a given hourly period provided the daily total was not exceeded. The analysis in the Environmental Assessment incorrectly assumes a consistent 24 movements hourly. This grossly under-estimates the potential traffic impacts and the assessment should be refined to consider an hourly time-step for likely additional vehicle movement, based on pattern of existing daily variation of vehicle movement from the site.

The Environmental Assessment for the proposal considers only existing traffic figures. The Tweed Shire Council has supported in principle, the nearby Dunloe Park urban development. This development will cater for an additional 6000 residents using Pottsville Road as their main access point. There will also be additional heavy vehicular movement during extended development stage. This should also be considered in estimating traffic impacts. There is also likely to be a secondary effect, with an increase in traffic down the extended Kellehers Road as people seek to avoid Pottsville Road. These factors also need to be addressed.

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