



By email: office@hazzard.minister.nsw.gov.au

13 November 2012

FOR THE URGENT ATTENTION OF THE MINISTER

The Hon Brad Hazzard
Minister for Planning and Infrastructure

Re: PLANNING & INFRASTRUCTURE Application 08-0142 MOD 1

ALTERNATIVE HAUL ROUTE TO LOT 218 DP 1044608. October 2012

Dear Minister Hazard,

We object to this application on the grounds that it contains insufficient controls to ensure public safety, illustrated in the following points:

Although the new haul road intersection, proposed by Mackas Sand, is designed so that trucks do not cross the traffic flow;

- All trucks must enter the site from east and leave to the west.
- All entering trucks must go around the Salt Ash Roundabout.

Mackas Sand Pty. Ltd. also operates a quarry located at Lot 220.

- Trucks from this quarry enter the Nelson Bay Road at the Lemon Tree Passage roundabout.
- The vast majority turn west and use the Salt Ash roundabout.
- Further sand mining operations have been proposed recently or are already operating in the area.

The Salt Ash Roundabout, services via a slip road;

- A shopping complex (Pauls Corner).
- Salt Ash Public School.
- It is a major intersection for traffic from Nelson Bay going to the Pacific Highway, the New England Highway and Newcastle.
- All vehicles travelling to or from Nelson Bay have to pass through Salt Ash Roundabout.
- Therefore the Salt Ash Roundabout is critical to truck movements from **both** Macka Sand Pty Ltd quarry operations and also other operators in the area.



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The Traffic Study in the application:

- **Only** dealt with the impact of truck movements from lot 218. It did not consider the combined impact of **both** sites.
- The traffic study by TPK and Associates Pty. Ltd. considered the average truck movement generated over a 12 month period, if the company extracted 500,000 tonnes/annum.
- It considers peak load caused by difficulties in strictly regulating truck movement.
- What was not included was the **production capacity** of the quarry.

Production Capacity

If the production capacity of the Quarry at lot 218 is 3200 tonnes/day

- Then a truck would leave or enter Lot 218 every 3.75 minutes
- One truck would go around Salt Ash Roundabout every 7.5 minutes.

If the production capacity is 6400 tonnes/day

- Then trucks would leave or enter Lot 218 every 2 ½ minutes
- One empty truck would go round Salt Ash roundabout every 4 minutes.

If the Quarry at lot 220 is operating at the **same rate** then a truck would be entering or leaving Salt Ash Roundabout every 1.3 minutes.

Safety / Capacity

This development has insufficient controls on quarry production to protect public safety. Therefore:

- Production rates used to calculate traffic flows should be based on the quarries' **maximum output** and a restriction put on daily output to minimise public risk.
- The approved extraction tonnage should not only be an **annual figure**. It should also include a maximum **daily production rate**.



Conclusions

If both quarries produce 3200 tonnes/day:

- Then the traffic flow at Salt Ash roundabout is a truck every 2.5 minutes. (Based on TPK peak figures for Lot 218 – Traffic survey taken 24.7.12 – 7.45- 8.45 am and on 23.7.12 – 4 – 5 pm.
- It is noted that this timing of the survey does not take into account the varying working hours of 3000 RAAF officers who use the Salt Ash Roundabout, tradespeople or those in the mining industry who commute daily from Nelson Bay to the Upper Hunter)

If both quarries produce 21000 tonnes/wk

- Then the traffic flow at Salt Ash Roundabout is a truck every 1.3 minutes.
- If this level of production was maintained for 12 weeks then production would reduce to 6000 tonnes/wk for the rest of the year

We therefore submit that:

- The application for lot 220 was approved in 2008 and has already created an impost on the people that use the Nelson Bay Road every day to get to work and the tourists that are the lifeblood of our economy.
- Access to lot 218 has already been approved through to Lavis lane in 2009. This access has already been amended once including a resumption of private land. This avoids the problem of large trucks moving up and down on both sides of the narrow part of Nelson Bay Road and the inevitable congestion at the Salt Ash roundabout and at the intersection of the new entrance to the mine as trucks slow down/accelerate out of the mine..
- There is no indication of how much of the 2 million ton capacity of the two mines will be utilised.
- **Clarification Required - can Mackas Sand Pty. Ltd change production levels after the approval of the proposed haul road? The licence is due for renewal 30 Nov 2012.**
- **The application should be refused on the grounds that it is not clear what capacity the roads will have to carry and the traffic study contains insufficient controls to ensure public safety.**

Dick Appleby

Vice President

Tomaree Ratepayers & Residents Association Inc.

Refer To Attachment 1 - Background Information - Assumptions

Refer To Attachment 2 - Calculation Tables



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Refer To Attachment 3 - Location Map



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ATTACHMENT 1

BACKGROUND INFORMATION - Application 08-0142 MOD 1

NSW DEPT OF PLANNING - 24-Oct-08

Approval for 2 million tonnes / ann. (1mt from each lot)

EPA Licence No.13218 MACKA'S SAND PTY LTD 2684 NELSON BAY ROAD
Issued 30/11/2009

- Macka Sands is currently licensed to extract 500,000t/ann. however the licence acknowledges that each site can extract 1mt/ann.
- Licence due for renewal 30 November 2012

CLARIFICATION NEEDED - CAN MACKA SAND PTY LTD CHANGE PRODUCTION LEVELS AFTER THE APPROVAL OF THE PROPOSED HAUL ROAD?

Environmental Assessment: Dated October 2012
Umwelt Australia Pty Ltd: Peter Jamieson Director

Page 4	Transport of sand from lot 218...
	Monday to Friday EST 6am to 6pm
	Monday to Friday DST 6am to 7pm
	Saturday 7am to 4pm
	Sunday and public holidays No truck movements

Page 4.19	Traffic Access and Public Safety	
	Noise	The above operating times are repeated

Macka Sands Website

Appendix 2 Noise Management Plan, Attachment Appendix 1

Macka Sand Quarry Traffic Management Rules dated: December 09

This document gives quarry operating times:-

Monday to Thursday	6am to 6pm
Friday	6am to 5pm
Saturday	6am to 12 pm
Sunday and Public Holiday	Bulk loads by arrangement



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TRANSPORT- Roads and Maritime Services - Dave Young 49240688

EXTRACT FROM HIS LETTER DATED: 03/02/12 to Dept Planning and Infrastructure,

"... it is considered that the alternate haul route for access to the approved sand extraction area will have no additional impact on the classified road network."

APPENDIX 5 - Traffic Report prepared by TPK and Assoc dated: Oct 2012

Comment

Applies to lot 218 only.

- There was an agreement reached with Roads and Maritime - Newcastle to allow these trucks to enter Nelson Bay Road
- This study is based on a seven day operation with 16 hour day Monday to Friday and restricted truck movement at weekends and public holidays
- For the purposes of this traffic study, a peak load of 8 empty trucks in and 8 loaded trucks out in an hour appears to have been adopted.
- Peak flows a truck leaves the site every 7.5 minutes - this means a truck enters or leaves the site every 3.75min.



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Attachment 2

Calculation Tables

BASED ON TPK and Assoc. Truck FLOW
FIGURES
CALCULATED TRUCK MOVEMENT -
500,000 tonnes/ann.

LOT 218 Only

t/mined/ann. 500000	t/ truck 33	total truck movements 15152	Operating Days 240	Loaded Trucks/day 63	tonnes/week
Operating weeks/ann. 48	days/wk 5	Daily hrs/operation 12	annual operating hrs 2880	Peak Flow Factor 1.6	
Loaded Truck movement/hr 5	Empty Trucks/hr 5	Total Truck movements/hr 10	Av. frequency/min 6.00	Tonnage/day 1980	9900
Loaded Truck movement/hr 8	Empty Trucks/hr 8	Total Truck movements/hr 16	Av. frequency/min 3.75	Tonnage/day 3168	15840

CALCULATED TRUCK MOVEMENT Base on
1,000,000 tonnes/ann.

LOT 218 Only

t/mined/ann. 1000000	t/ truck 33	total truck movements 30303	Operating Days 264	Loaded Trucks/day 115	tonnes/week
Operating weeks/ann. 48	days/wk 5.5	Daily hrs/operation 12	annual operating hrs 3168		
Loaded Truck movement/hr 10	Empty Trucks/hr 10	Total Truck movements/hr 20	Av. frequency/min 3.0	Tonnage/day 3788	18939
Peak Truck movement/hr 15	Empty Trucks/hr 15	Total Truck movements/hr 30	Av. frequency/min 2.0	Tonnage/day 5940	29700



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CALCULATED TRUCK MOVEMENT for Lot 218 & 220
IMPACTS ON SALT ASH ROUNDABOUT

		Tonnes/ann	Trucks/hr	Frequency in Minutes	tonnes/week
Scenario A	Annual Production Lot 220	500,000	16	3.80	10417
	Annual Production Lot 218	0	0	0.00	
Scenario B	Annual Production Lot 220	0	0	0.00	
	Annual Production Lot 218	500,000	8	7.50	10417
Scenario C	Annual Production Lot 220	250,000	8		5208
	Annual Production Lot 218	250,000	4	5.00	5208
Scenario D	Annual Production Lot 220	1,000,000	32	1.70	20833
	Annual Production Lot 218	0	0	0.00	
Scenario E	Annual Production Lot 220	0	0	0.00	
	Annual Production Lot 218	1,000,000	16	3.80	20833
Scenario F	Annual Production Lot 220	500,000	16		10417
	Annual Production Lot 218	500,000	8	2.50	10417
Scenario G	Annual Production Lot 220	1,000,000	30		20833
	Annual Production Lot 218	1,000,000	15	1.33	20833



Attachment 3 - Location Map

- Location of 2 Mackas Sand Mines, lot 220, Lot 218
- Access Road and Proposed Intersection
- Salt Ash Roundabout



