



**RE: MODIFICATION REQUEST
SALT ASH SAND QUARRY PROJECT – MODIFICATION 4 (MP 07_0094
MOD 4)**

To Director – Resource Assessments, Department of Planning and Environment (DPE),

On behalf of Macka's Sand and Soil Supplies, I am writing to object to the proposed Modification 4 for the Salt Ash Sand Quarry Project. We reject the Redisand 'Modification to Redisand Salt Ash Sand Project' Environmental Assessment (the Redisand EA) based on two key points –

- **Truck Movements:** The Salt Ash Sand Quarry Project seeks to increase the allowable truck movements off site from 3 per hour averaged over a working day to 3.5 per hour averaged over a working day. The proposal does not limit truck movements per hour, to allow for the safety of users of Nelson Bay Road during hours (e.g. during the peak hours of 6:00 am to 9:00 am in the morning). The extension of operating hours to commence at 6:00 am instead of 7:00 am also means that additional truck movements per hour will occur during the hour of 6:00 am until 7:00 am. The number of specific truck movements per hour during the morning peak traffic hours is proposed to remain unrestricted and therefore potential impacts to traffic during peak hours could occur.
- **Intersection of Janet Parade and Nelson Bay Road:** The T-intersection at the corner of Janet Parade and Nelson Bay Road is not proposed to be upgraded as part of the modification. According to the Traffic Impact Assessment by SECA Solution attached to the Redisand EA, the intersection has adequate sight distances. Macka's Sand contends that the intersection does not provide acceleration and deceleration lanes to sufficiently address public safety of the truck movements entering and exiting the site from the intersection. The intersection currently allows for right-hand turn across traffic from Janet Parade onto Nelson Bay Road. A review of publicly available information on historical traffic incidents at the Janet Parade and Nelson Bay Road intersection has identified that four significant traffic incidents have occurred at the intersection since June 2015 (<http://www.snarl.com.au/incidents/suburb/nsw/salt+ash?p=5>).

Truck Movements and Hourly Truck Movement Limitations

The Salt Ash Quarry Project Approval (PA 07_0094) allows for approved truck movement limit of 3 truck movements per hour when averaged over a working day (Condition 7 of Schedule 2). The Redisand EA proposes an increase to 3.5 truck

movements per hour when averaged over a working day. This represents an increase in total trucks per day from 30 to 42.

The proposed modification does not specify the time of day which trucks will be required to leave the site and assumes that truck movements will be evenly distributed across the day. It is therefore possible that all 42 trucks could leave the site within a small period of time in the morning peak traffic hours. This would severely impact upon traffic in the peak traffic hours for commuters travelling to Newcastle and for school children catching buses in the region.

Macka's Sand is located in the Salt Ash / Williamstown region and truck movements from the Macka's Sand exit onto Nelson Bay Road. In accordance with the Macka's Sand Project Approval (PA 08_0142), Macka's Sand are required to limit trucks per hour throughout the day to minimise impacts to traffic flows on Nelson Bay Road and surrounding areas. Condition 4B of Schedule 3 of the Macka's Sand Project Approval (08_0142) limits truck movements to Nelson Bay Road from the Macka's Sand Lot 218. The hourly truck movements in the morning are limited to 8 laden trucks exiting the site per hour between the hours of 6 am and 9 am. This requirement was imposed by the Department of Planning and Environment (DPE) through the March 2016 modification to the Macka's Sand Project Approval.

Macka's Sand sees no reason as to why the Redisand operation should not be subject to the similar hourly truck movement conditions for the safety of the road and potential for traffic flow impacts.

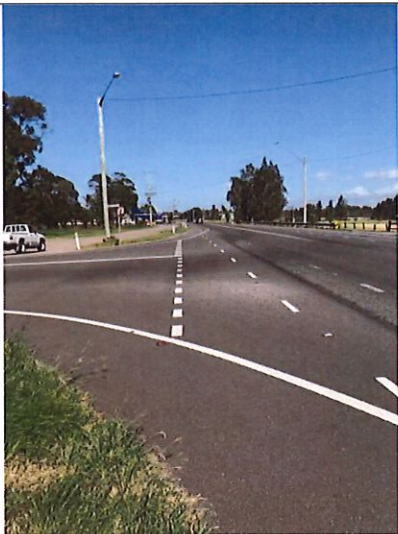
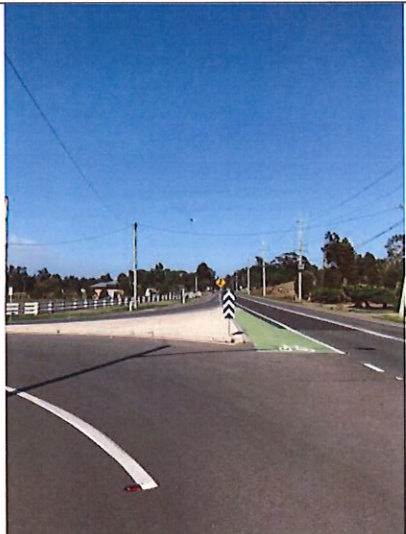
Janet Parade / Nelson Bay Road Intersection

The currently approved intersection at Janet Parade and Nelson Bay Road does not provide an acceleration lane for haul truck movements exiting the site and turning left onto Nelson Bay Road, nor does it provide for an adequate deceleration lane for traffic approaching and entering the site to turn right onto Janet Parade. A small widening of the road has been completed as part of a previous modification, which allows for cars to pass haul trucks waiting to turn right onto Janet Parade.

Through the modification to Macka's Sand PA 08_0142 determined by the PAC in March 2016, it was determined that the Alternate Access Road allowing access for Macka's Sand Lot 218 would require a major Left in Left out AUL with a medium divider intersection, onto Nelson Bay Road, including a left turn in, left turn out arrangement with deceleration and acceleration lanes for heavy vehicle movements to allow for the safe movement of traffic.

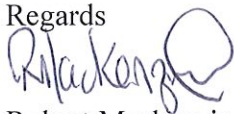
A review of publicly available information on historical traffic incidents at the Janet Parade and Nelson Bay Road intersection has identified that four significant traffic incidents have occurred at the intersection since June 2015 (<http://www.snarl.com.au/incidents/suburb/nsw/salt+ash?p=5>). As a result, Macka's Sand sees no reason as to why the Janet Parade / Nelson Bay Road intersection should not be upgraded to allow for the safe movement of heavy vehicles at the intersection.

Table 1 - Comparison of Macka's Sand and Soil Project Approval Conditions to Redisand Proposed Modification

Item	Redisand (as proposed)	Macka's Sand Lot 218 (as approved)
Hourly Truck Movements	3.5 laden truck movements offsite per hour averaged over the working day. As written in the EA, the site could feasibly load 10 trucks per hour utilising existing equipment.	Truck movements restricted per hour as per the Project Approval. Truck movements to a maximum of 8 trucks per hour between the hours of 6 and 9 am
Intersection	No upgrade proposed to Janet Parade / Nelson Bay road intersection. No deceleration or acceleration lanes	Upgraded as required by DPE to include deceleration and acceleration lanes for safety purposes. No right hand turn in or out from site.
Photo of Intersection		

If you have any questions regarding this submission, please call Robert Mackenzie on 0408 490 911.

Regards



Robert Mackenzie