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The NSW Department of Planning and Infrastructure,  
GPO Box 39,  
Sydney. N.S.W. 2001.

**Subject: Ardmore Park Quarry modification of PA 07\_0155 submitted by Multiquip Quarries – Alternate Haul Routes**

Dear Sir/Madam,

I wish to submit my objection to the above modification request as detailed below.

**A) Proposed alternative transport routes on existing unimproved surrounding road network not included in the approval transport route**

1. The applicant already has an approved haulage route in order to transport product to market including both local and non local. This route has some conditions of consent to protect other road users. This is the haulage route which should be utilised and no other.
2. Project Approval (PA) 07\_0155 was granted on 20<sup>th</sup> September 2009 conditional to certain transport route upgrades being undertaken. Note that the original development application made in 2005 was refused by the Minister for Planning and subsequently upheld by the NSW Land and Environment Court with one of the reasons being that the heavy vehicle movements could not be accommodated without unacceptable risk to road users of the proposed transport route. Multiquip then modified the application to include upgrading of these public roads. The Department of Planning commissioned an independent traffic expert to review this proposal. Recommendations were then made and approval granted with all of the recommendations adopted as conditions of approval. These upgrades are in 3 stages in order to upgrade the roads to satisfaction of the local council, The Goulburn Mulwaree Council. Until stage 1 is completed no transportation of product can occur. These identified upgrades include a minimum 7.0 meter sealed carriageway along the entire transport route comprising of 2 x 3.0 meter lanes and 2 x .5 meter shoulders, plus 2 x .5 meter unsealed shoulders.

Multiquip have provided road assessments and supporting measurements. Local anecdotal evidence points to the possible underestimation of traffic movements in the proposal. I have undertaken my own measurements in order to assess the validity of the data presented by Multiquip in relation to The Route Inventory of Oallen Ford Road – Windellama Road to Braidwood Road Intersection as presented by the applicant in table 5.3 of the EA and I have found that the claim of Oallen Ford Road being a 7.2 meter wide road, Windellama Road being a 7 meter wide road, and Brisbane Grove Road being a 7 meter wide road is only partially correct. Contradictory data is obtained depending on the section of the road that is observed and measured. Therefore the data presented in Table 5.3 does not accurately present the full picture of the condition of the road. In my opinion and from the data I have presented in Table 1 below I think that measurements have been cherry picked to give the impression that the road is much wider and in better condition as a whole than it actually is. The new proposed unimproved routes are to be used by up to 10 extra heavy vehicle truck movements per day with no work at all being conducted. The route includes utilising bridges which are load restricted, roads where legal speeds are 100kms per hour, unsealed dirt roads, sealed roads narrower than 7.0 metres, and roads with uneven potholed surfaces. These roads are no better and possibly worse than the current approved route. The applicants

tendered traffic flow data for the South, East, and West route states that an increase in heavy vehicle movements per day would be in the vicinity of 63% or from 16 to 26. This represents a major increase of heavy vehicle movements in comparison to the current state and on unimproved, both paved and unpaved dirt roads would propose an unacceptable traffic safety hazard to all road users. The existing standard of the road is unacceptable for running an extra 10 truck movements per day.

**Table 1      Audit of submitted route inventory by Mutliquip – Oallen Ford Road – Windellama Road – Brisbane Grove Road.**

Distance from Quarry Gates	Local Road Feature
6.5	Causeway; Significant dip in roadway and 5.8 meter carriageway only allows for one way passing traffic.
8.8	Oallen Road Shop; Carriageway 6.1 meters. Traffic hazards of Crest of small hill, Crossroads of Jacqua and Yarralaw Roads, and 2 driveways for incoming and outgoing shop traffic.
10.9	Concealed Driveway with warning sign; very uneven road edge in northbound lane.
15.3	Approaching crest; no centreline
16.2	Approaching crest; no centreline
17.5	Carriageway width 5.9 meters
18.1	Carriageway width 6.0 meters
19.8	Carriageway width 5.7 meters
21	Windellama School; carriageway width 5.6 meters
22.9	Carriageway width 6.6 meters
24.4	Carriageway width 6.3 meters
26.5	Floodway; carriageway width 5.9 meters with significant dip in roadway and water damaged asphalt
31	Carriageway width 6.8 meters and no shoulder
36	Carriageway width 7.3 meters
37	Carriageway width 6.5 meters
39.2	Carriageway width 6.5 meters
41	Carriageway width 7.4 meters
46	Carriageway width 7.3 meters
48	Fife's Bridge at Gundry Creek; carriageway width 6.2 meters with high concrete edges
52.5	Carriageway width 6.5 meters
53.6	Carriageway width 5.7 meters
54.3	Carriageway width 5.7 meters

3. The proposal states that some (undetermined and unspecified) deterioration to the unsealed roads will occur due to the heavy vehicle movements and that the applicants will pay the Goulburn Mulwaree Council 4 cents per tonne per kilometre travelled to reimburse

Council for damage maintenance to the roads. As the estimated damage to both the unsealed and sealed roads has not been quantified and specified, we cannot be assured that the 4 cent Section 94 contribution will cover the damage and required maintenance. Ratepayers should not have to subsidise the cost via increased rates for increased road maintenance costs when any profit from the quarry operations will go to Multiquip and not the ratepayers of Goulburn Mulwaree LGA.

4. The application states that the proposed route will only be used for movement of product to satisfy local deliveries within the Goulburn Mulwaree LGA to meet local needs, that dirt roads would not be used during or after heavy rain, and that weight limits would be adhered to unless the road was required to be used to travel to deliver product (which actually means that if Multiquip wish to use that weight limited road then they will do so even if the truck is over the load limit). However the application does not mention how or what measures or monitoring would be proposed to demonstrate compliance especially as the original approval set out strict regular monitoring and reporting requirements. It is therefore possible that Multiquip could in fact utilise this route if approved, to transport material out onto the Hume highway allowing access to other than local markets including travel north to Sydney, without having to spend the money on the already approved haulage route. It is also possible that Multiquip could use dirt roads during and after heavy rain and as well as flouting weight limits.

b) Claim that Extensive Consultation has occurred with the General Community

1. It is stated in the submission that consultation has occurred during the preparation of the EA. I attended one meeting in the Bungonia hall on Wednesday April 17<sup>th</sup> at 10.00AM. This meeting was extremely short as the proponents walked out very angrily after answering a few concerns of the residents. I have been unaware of any other meeting or consultation that has occurred and certainly this has been my only engagement and only because I took the initiative to find out about the meeting and attend. I do not believe that a reasonable attempt has been made by the applicant to engage with me or keep me informed of the new proposal and certainly my concerns have not been appropriately addressed. It is my opinion that the claims made in the EA regarding community consultation are designed to purposely mislead you into thinking that many residents have been engaged by the proponents throughout the month of May 2013.

In finishing I request that the submitted modification be refused.

Yours faithfully,

Jackie Neill  
Christopher Neill