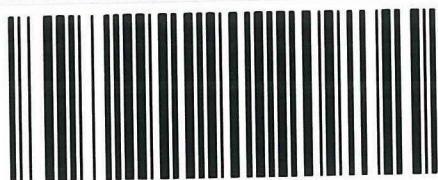


J.A & J.P Carlton
Pacific Highway, Ulmarra NSW 2462
0428 445278 jcarlton@nor.com.au

19 July 2017



PCU071728

Department of Planning
Received
24 JUL 2017
Scanning Room

Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Director,

I am writing this submission in regard to the impacts of stock routes of the newly built correctional center along Avenue Road in Grafton.

We have six properties on Avenue Road, 5 free hold and 1 lease hold as listed here : Lot 2 DP 1181336 1104 Avenue Road Glenugie, Lot 1 DP 793765 Avenue Road Glenugie, Lot 35 DP 785807 1104 Avenue Road Glenugie, Lot 325 DP 751390 1104 Avenue Road Glenugie, Lot 397 DP 751390 1104 Avenue Road Glenugie, DP 751376/138 Avenue Road Lavadia, DP 751376/139 Crown Reserve Lavadia, Lot 1 Lot 2 Lot 3 DP 1094985 1015 Avenue Road Lavadia.

We have a current permit/license (permit number 25_2017_209320860) issued by the Local Land Services to drove/walk cattle between these properties on Avenue Road. Through our current permit it states that we have the right to walk/drove cattle on Avenue Road 7 days a week, 365 days a year (not just in flood time) whenever it suits us and without having to give notice to any other party.

We also have 5 free hold properties as well as 2 lease hold properties on the flood plain of Ulmarra stocked with cattle, the movements of cattle from these properties also fall under the permit number as mentioned above.

As well as grazing and breeding cattle, the properties on South end of Avenue Road are flood refuges for the properties that we have on the North end of Avenue Road and at Ulmarra.

For our business, Avenue Road is the gateway off the flood plain and allows us flood free access to sale yards and abattoirs as well as the ability to send cattle on agistment and to bring in stock fodder.

Stock numbers on these properties change from season to season, large numbers of cattle can be held on these properties, that would potentially lead to movement of these cattle along Avenue Road at any one time.

We believe that the traffic impact from the correctional center in full operation of 714 vph equating to 11.9 vpm and whilst under construction of 905 vph equating to 15 vpm as quoted in the environmental impact statement under Transport and Accessibilities section 6.4.2 page 106-108, would make it impossible to drive cattle past the correctional center and along Avenue Road.

We believe that the Stock Movement Protocol that has been proposed by John Holland is drastically inadequate to facilitate any cattle movements along Avenue Road as cattle movements can take multiple hours to complete. Cattle can be unpredictable when working with them and we believe that there are not enough safety interventions and procedures that can be put into place for unforeseen circumstances that may arise to keep both cattle and the public safe.

We are concerned that due to the amount of traffic proposed in the Environmental Impact Statement, that the Department of Local Land Services may not renew and or possibly revoke our current or future permits due to safety concerns of the public.

We have gone to great expense to acquire land along Avenue Road, without it we will not be able to continue our cattle business which would destroy our livelihood.

Infrastructure NSW has proposed to go to great lengths to improve Avenue Road for their own benefit, this relates to the widening of Avenue Road and the subsequent resealing of Avenue Road. We feel that these proposed changed road conditions will not accommodate our position as drovers along Avenue Road.

We are not opposed to the construction and operation of the correctional centre as we feel it will be a great benefit to the Clarence Valley, our concerns are the the impact on our

farming business and its ability to continue and operate as it has in the past. Looking forward to discussing this matter at a time convenient to you.

Sincerely,

A handwritten signature in blue ink, appearing to be 'J.A. Carlton', written in a cursive style.

J.A & J.P Carlton

A handwritten signature in blue ink, appearing to be 'J.P. Carlton', written in a cursive style.

Avenue Road and Eight Mile Lane

The intersection at Avenue Road and Eight Mile Lane is an un-signalised at grade intersection. Avenue Road is currently a narrow country road with a sealed pavement width of approximately 4m. Eight Mile Lane is a two-lane rural road with a sealed pavement width of approximately 9m. Good sight distance is available from Avenue Road both east and west along Eight Mile Lane.

Traffic movements at the intersection during the AM peak in 2020 with the NGCC in full operation are estimated as:

- Avenue Road: northbound – 356 vph; southbound – 358 vph with 3 turning left and 355 turning right into Eight Mile Road
- Eight Mile Lane: eastbound – 424 vph with 354 vph turning left into Avenue Road; westbound – 450 with 93 vph through traffic and 355 vph turning right from Avenue Road

Traffic movements at the intersection during the AM peak in 2018 with the NGCC under construction are estimated as:

- Avenue Road: northbound – 904 vph; southbound – 6 vph with 2 turning left and 4 turning right into Eight Mile Road
- Eight Mile Lane: eastbound – 955 vph with 902 vph turning left into Avenue Road; westbound with 73 vph through traffic and 2 vph turning right from Avenue Road

Sidra analysis of the intersection shows Level of Service (LOS) A during NGCC operation and LOS A during construction. This will result in optimum operating conditions (free flow), meeting the requirements of RMS for rural roads.

The existing Pacific Highway and Eight Mile Lane

The intersection at the existing Pacific Highway and Eight Mile Lane is an un-signalised at grade intersection. The existing Pacific Highway is currently a two-lane rural highway with a sealed pavement width of approximately 10m. Eight Mile Lane is a two-lane rural road with a sealed pavement width of approximately 9m. Passing and slip lanes are provided on the existing Pacific Highway to facilitate left turn into Eight Mile Lane from the north and right turn into Eight Mile Lane from the south. Good sight distance is available from Eight Mile Lane both north and south along the existing Pacific Highway.

Traffic movements at the intersection during the AM peak in 2020 with the NGCC in full operation are estimated as:

- Existing Pacific Highway: northbound – 178 vph with 35 vph turning right into Eight Mile Lane; southbound – 480 vph with 385 vph turning left into Eight Mile Lane
- Eight Mile Lane: eastbound – 420 vph; westbound – 445 vph with 30 vph turning left into existing Pacific Highway and 415 vph turning right into existing Pacific Highway

Traffic movements at the intersection during the AM peak in 2018 with the NGCC under construction are estimated as:



Local Land
Services

Routine Stock Movement Permit

Issuing authorised officer:
North Coast Local Land Services
PO BOX 1417
COFFS HARBOUR NSW 2450
Phone: 02 6563 6700
Fax: 02 6562 7693
Email: admin.northcoast@lls.nsw.gov.au

| | |
|---------------------|------------------------------|
| Permit No: | 25_2017_209320860 |
| Duration of permit: | 24 May 2017 to 30 April 2018 |

This permit is issued pursuant to section 78 of the *Local Land Services Act 2013*. This Permit is subject to the conditions listed in Attachment A.

The holder of a permit who contravenes any condition of this permit may be guilty of an offence under the *Local Land Services Act 2013*.

This permit authorises:

| | |
|-------------|-----------------------------------|
| Name: | JA CARLTON |
| Of Address: | 1388 Pacific Hwy ULMARRA NSW 2462 |

("Permit Holder"),

to move stock owned or currently in his or her charge along a public road or travelling stock reserve in the following manner:

WALKING STOCK

To walk stock on the specified route of travel between any or all of the specified properties at any time between sunrise to sunset on any one day so long as the entire journey is completed in that time.

AND

TRANSPORTED STOCK

To move stock by vehicle at any time on any day between any or all of the specified properties using the specified route of travel.

Journeys authorised between the following properties using defined routes of travel :

| Specified Property (by reference to Holding reference number) | Specified route of travel: |
|---|--|
| Ref No: 109171090 | Between paddocks along and across Watkins Lane Post Office Road Coldstream Lavadia and Avenue Road Ulmarra and return. |

This permit authorises the movement of stock which are free of disease.

Signed (Issuing Authorised Officer):

Date:

25/5/17

| | |
|---------------------|------------------------------|
| Permit No: | 25_2017_209320860 |
| Duration of permit: | 24 May 2017 to 30 April 2018 |

CONDITIONS TO THIS ROUTINE STOCK MOVEMENT PERMIT

1. When stock are being walked along or through a public road or a travelling stock reserve, so far as it is reasonably practicable to do so, the stock must be kept off any part of a road which is a bitumen or made up road surface or in relation to a dirt road, any part of the road routinely used by vehicles. Wherever possible, stock should be walked on the areas to the sides of the road where vehicles do not routinely travel, such as, for example, the dirt or grassed sections to the side of a paved road.
2. Local Land Services ("LLS"), or an authorised officer of LLS, may, at any time, issue a direction to the Permit Holder to increase the number of persons supervising walking stock on a public road or travelling stock reserve, for the purpose of minimising the risk to passing traffic or for any other reason LLS or the officer considers appropriate. Such direction may be given orally or in writing.
3. Notification of stock being moved along unfenced public roads is required to be given to all owners or occupiers of the land through or alongside which the stock will pass at least 48 hours prior to commencement of moving stock.
4. The Permit Holder must hold, at his or her own cost, for the life of this permit, a broadform public liability policy of insurance to the value of at least \$20 million, in respect of each claim and unlimited in the aggregate as to the number of occurrences in the policy period, which fully covers the activities allowed under this permit.

Stock ahead signs

5. When stock are being walked along or within 300 metres of a public road and there is no intervening fence or barrier between the stock and the road, the permit holder must clearly display stock ahead signs for the benefit of road users.
6. If stock are being moved not more than one kilometre on a public road, signs are to be displayed at the place on the public road no more than 500 metres and no less than 200 metres before the place where the movement of stock is to begin, and no more than 500 metres and no less than 200 metres after the place where stock are to leave the road.
7. If stock are being moved more than one kilometre on a public road, signs are to be placed on the road so that there is not more than 5 kilometres, and no less than 200 metres, between the sign and the place where a vehicle being driven towards stock would first encounter stock.
8. The Permit Holder must ensure that the signs are removed as soon as practicable after all stock have left the road.
9. A stock warning sign must:
 - a. be constructed of rigid metal, heavy-duty plastic, corrugated or other rigid and durable material; or
 - b. a material which can be folded or rolled and which is securely held by a frame of posts while being used as a warning sign; and
 - c. comply with the specifications as to size, colour and design for T1-19 "Stock AHEAD (Symbolic)" signs that are set out on the Roads & Maritime Service website at:
<http://www.rms.nsw.gov.au/cgi-bin/index.cgi?fuseaction=trafficsigns.show&id=temporary/t1/t1-19>
 or if not accessible via that link, can be accessed on the Roads and Maritime website by following the series of links: Home > Business & Industry > Partners & suppliers > Signage > Traffic signs, and entering search term "T1-19".

Signed (Issuing Authorised Officer):

Date:

Q/S

25/5/17

Stock Movement Protocol

| STEP | DESCRIPTION | BY WHOM |
|------|--|--------------------------------------|
| 1.0 | Landowner advises JHG via 1800 number and/or email of proposed stock movement. | Landowner |
| 2.0 | Community and Stakeholder Manager to confirm with landowner prior to event: <ul style="list-style-type: none"> - Movement is occurring. - Head/Number (approx.). - Likely time and duration of movement | Community and Stakeholder Manager |
| 3.0 | Community and Stakeholder Manager to advise Internal Project Stakeholders and Contractors of upcoming movements. | Community and Stakeholder Manager |
| 4.0 | Project Stakeholders and Contractors to advise planned deliveries and driver(s) of potential risk and restrictions entering site. | Project Stakeholders and Contractors |
| 5.0 | Access points and surrounding fencing to be closed and secured to stop stock wandering into NGCC. | Site Manager |
| 6.0 | Landowner places "cattle on road" signage on stock route as required | Landowner |
| 7.0 | Stock movement occurs | Landowner |
| 8.0 | Vehicles held leaving NGCC until such time as Stock Movement has passed site and access clear from obstruction. | Site Manager |
| 9.0 | Site access points opened to vehicular traffic. | Site Manager |
| 10.0 | Normal operations and deliveries recommence | All |