

8<sup>th</sup> April 2017

Seaham Rd,  
NELSONS PLAINS NSW 2324

The Minister for Planning.

## **RE: Brandy Hill Quarry Expansion**

We refer to the proposed development of the Brandy Hill Quarry (BHQ) expansion project and their final environmental Impact Statement (EIS) dated February 2017 and provide this letter as a submission to this significant development.

Our property is zoned RU1 (primary agriculture) and we are located within a 5klm distance from the BHQ entrance. We live in the small hamlet/village of Nelsons Plains which fronts Seaham Road. Our property boundaries extend 2klm from the road frontage (Seaham Road) to the rear boundary which, fronts the Williams River. Our primary agricultural activity is beef cattle production

Like many of our surrounding neighbours, we have lived here for many years and the use of our land (as primarily agricultural activities) has existed well before BHQ or other surrounding quarry operations. The fabric of our farm land and surrounds has remained relatively unchanged since the late 19<sup>th</sup> Century.

Our children are the direct descendants of the Foot Family who commenced farming in Nelsons Plains over 120 years ago. There are at least 8 other RU1 zoned land holdings (within the local area) which, are also owned by the direct descendants of the original Foot Family. The location of these land holdings are within the Port Stephens and Maitland Council LGA's in areas such as: Nelsons Plains, Mount Kanwary, Osterley, Swan Reach, Millers Forrest, Wallalong, Woodville and Rosebrook.

As long term residents in this area, we have generally accepted the level of haulage and vehicle activities within our location however, the recent flyer placed in our mail box (from Brandy Hill action group) prompted us to review the proposed quarry expansion and determine what the direct impacts were to our property.

On the basis of reviewing the proposed development and EIS (which indicates a significant increase of haulage movements), we have realised that this proposal not only affects residents at Seaham and Brandy Hill Drive but also has a significant impact to our property and other residents living within Nelsons Plains.

After reviewing the proponent's EIS and submission documentation, we wish to make comment under the various sections outlined in the BHQ EIS;

## Traffic and Transport

### Capacity of Existing Road network

The EIS indicates that the existing road network has significant spare capacity for traffic growth generated by additional development in the area however; the EIS does not consider the incompatibility of this expansion with other surrounding land uses where the main haulage routes are within RU1 zoned land.

### Existing intersection Capacity

The EIS only addresses two intersections at Brandy Hill Drive/Clarence town Road and Brandy Hill Drive/Seaham Rd. The report indicates that both these intersections operate with excellent level of service.

The EIS only provides information in relation to Traffic count calculators installed at the Clarence town road and BHQ entrance during 2014. The proponents should also be addressing current traffic flows along Seaham Road and other intersections such as Hinton Road and Raymond Terrace Road as part of their EIS.

As long term residents of Nelsons Plains, we would deem that we would have superior knowledge of the existing road networks and specifically safety and traffic issues. We disagree with the proponent's conclusion that projected increase in haulage movements will have no adverse impact on the local road network.

The Sidra Modelling referred to in section 5.6.2.4 of the EIS does not take into account two other vital intersections (**refer to annexure A- images of current road and intersection concerns**) which form part of the proposed haulage route. These are as follows;

#### Seaham Rd/Hinton Rd intersection

- Current pavement within the immediate area is in average condition with repairs, pot holes, alligator cracking and patches
- No turning bay for southbound vehicles turning right into Hinton Road
- Projected Increase of haulage movements travelling at 90km/h places a higher risk of safety to vehicles turning onto Hinton Road as there is no turning lane
- Road topography provides limited visibility approaching this intersection for both south and northbound traffic
- Downward slope southbound (toward the Hinton Road intersection) would lead to an increase in noise due to compression breaking primarily due to current speed zone and visibility
- Safety of school children on buses turning into Hinton Road as part of weekly bus travel routes
- Speed limit in this area needs to be reduced significantly to at least 20km less than the current speed of 90km/h

### **Seaham Rd/Raymond Terrace Rd intersection**

- Being a regular user of Seaham Road, the proposed haulage movements would add to existing congestion and safety to this intersection
- There have been numerous accidents at this intersection for some years
- There is only one eastbound lane at the intersection from Raymond Terrace to Seaham Road
- There is no secondary turning lane eastbound to turn left onto Seaham Road which currently already contributes to restrictions of traffic flow
- Increase of haulage movements along Seaham Road (in both directions) will create major congestion to all eastbound traffic travelling along Raymond Terrace Road
- The intersection should be considered significant to the haulage route as the current rate of accidents recorded should be addressed as part of mitigating safety to road users
- This intersection would require significant upgrades to accommodate the increase in projected haulage movements

### **Other road intersections along main haulage route of Seaham Road**

The EIS has not covered any issues in relation to driveway access, narrow shoulders, proximity of houses and other small roads connected to the main haulage route along Seaham Road.

Due to the current speed limit of 90km/h we regularly by-pass our driveway when travelling northbound to avoid rear end collisions. Many local residents use some of the following roads to do U turns to gain access to driveways to avoid potential accidents. The levels of condition of some of these roads are very poor or are unsealed.

- **Ralston Road** – unsealed, large pot holes, narrow (no shoulders) and obstructed by power pole with limited visibility – regularly used by residents as a u turn area to access driveways
- **Noongah Road**
- **Hinton Road (as noted above)**
- **Nobles Road**
- **Raymond Terrace Road (as noted above)**

### **Visual Impact-inconsistency with existing land uses**

The EIS indicates that the quarry site itself has no visual impact in relation to surrounding development and deems the impact as low or moderate from all viewing platforms.

The EIS however, does not consider the negative visual impact that will be created by a significant increase of heavy rigid vehicles along the current haulage route of Seaham Rd. The projected volume of haulage movements would be indicative of visual impacts similar to developments within industrial/commercial areas. This will likely change the existing rural fabric and setting of Nelsons Plains

## **Compatibility of proposed development**

The EIS has mainly only addressed properties located on Brandy Hill Drive which are RU2 zoned. The report however fails to identify potential impact on agricultural activities within RU1 zoned land in relation to the following matters

- Many existing RU1 zoned properties along Seaham Rd, Nelsons Plains have small road shoulders and limited access to driveways
- existing cattle loading races are built close to the road frontages for ease of access for cattle loading/offloading
- Proposed increase in haulage from the BHQ expansion (584 per day/78 per night) will significantly impinge existing rural activities – movements of cattle, moving hay on trailers, tractors using roads to access other farms, farm vehicles, use of horses across roads etc.
- Current speed limits varying from 90klm to 100klm (along Seaham Rd) combined with increased haulage movements would significantly restrict local farmers using Seaham Road during heavy peak times – this may result in restrictions to existing agricultural activities and operations

## **Driver Conduct**

The EIS indicates that a driver code of conduct will be implemented for the life of the project and **IF REQUIRED** a Traffic Management Plan will be implemented.

### **Our concerns are as follows;**

- Other than residents observing and complaining; who will be policing the correct use of haulage routes, speed limits, compression breaking etc.?
- How does BHQ project haulage movements and how is this monitored to ensure that the proponent would not be in breach of any consent conditions
- Without changes to current excessive speed limits (along Seaham Road), there are higher risks to local traffic, agricultural activities, school children getting on an off bus stops, access to driveways
- What measures will the RMS implement in regards to policing speed limits (i.e.: speed cameras etc.)

## Observations of current miss-use of local road networks – Tarro overpass via Anderson Drive

As daily users of the local road networks, we have also driven our children to and from a local School in Tarro which is located on Anderson Drive. Only this past week on Thursday the 6<sup>th</sup> of April at approximately 8.30am, we gave way to a fully laden Hanson quarry truck (with trailer) which was travelling southbound along Seaham Road. We continued to follow this truck (behind another vehicle) only to observe that this truck did not continue onto Adelaide Street but turned onto Raymond Terrace Road.

We then further observed this Hanson Truck turn left onto Woodbury road where it then continued through Woodbury and proceeded over the Tarro rail bridge. This haulage vehicle then turned left onto Anderson Drive where it then merged right onto the Tarro overpass to continue onto the New England Highway.

It would be our understanding that specific haulage movements relating to BHQ would not be permitted to use this back road for haulage purposes. We regularly witness many haulage trucks using this specific back road but are unsure of the origin of most of these heavy vehicles. During this particular observation, this one Hanson truck and trailer held up the normal traffic flow along Woodbury road and then held up local traffic at the foot of the Tarro rail bridge. This rail bridge is a hair pin shape and is far too narrow for any other vehicle to pass if it is being used by a large haulage vehicle.

The incident we witnessed this week has been recorded on our car camera which we are happy to provide to Hanson however, this incident demonstrates some uncertainty in relation to a large number of areas that Hanson claim to have addressed in their EIS.

In addition to this, google maps provides a route from the Central Coast or Sydney to BHQ which specifically directs you to using a backroad over the Tarro overpass, Tarro rail bridge via Woodbury, Millers Forrest onto Raymond Terrace Road (**refer to annexure B**). For this reason, I would like to see how BHQ aim to implement a TMP and a driver code of conduct where external contractors to the project will be educated in using the correct route via the pacific Hwy onto Adelaide Street. For this reason, the Traffic assessment outlined on the EIS is not complete as the proponent has not raised this area as a potential issue nor has BHQ had any consultation with Newcastle City Council.

The current condition of Woodbury road at the area of the rail bridge including the bridge itself is in very poor condition which, is indicative of damage caused by heavy haulage vehicles.

## Noise

Whilst BHQ have existing permits to operate at night, we have generally not encountered any large volumes of local or other traffic movements along Seaham Road over the past 20 years. For this reason our concerns relate to increases in noise during the day but more importantly the introduction of haulage moments at night. The EIS only identifies impacts relating to traffic noise along Brandy Hill (section 5.7.4.3). No modelling or traffic observations have been projected for any areas of Seaham Road, Nelsons Plains.

Our concerns are as follows;

- Compression breaking due to current speed limits, road topography and intersections at Seaham Road/Hinton Road
- Hanson appear to only commit to addressing noise levels (if deemed necessary) post approval by preparing a noise compliancy management strategy
- Loss of use of amenity. Many residents may need to leave windows and doors closed and may even need to resort to installing double glazing to windows and doors
- Noise receptors have only been placed along Brandy Hill drive and not in other locations within the direct haulage route along Seaham Road, Nelson Plains
- Noise generated from skidding during wet weather
- Current road surface of Seaham Road is already noisy from cars and 4WD's. These vehicles appear almost as noisy as haulage trucks
- Many houses being located closer to front boundaries along parts of Seaham Road would be significantly impacted by an increase in haulage movements
- Noise of empty haulage trucks returning to quarry
- speed limits need to be reviewed to reduce haulage noise impacts
- Loss of sleep quality due to residents along Seaham Road being accustomed to having little to almost no traffic movements at night (motor vehicles, trucks etc.). The traffic flow of vehicles at night is almost negligible from around 10pm to 5am. This loss of sleep quality may have long term effects on health due to the effects of significant increase in traffic volumes along Seaham Rd.

## Air Quality

Our main concerns with air quality are that we already incur a lot of air-borne dust carried by wind to our property which is approximately 5klm from the quarry entrance. Both the interior and exterior of our home is regularly coated with layers of dust which we can only assume to be from the BHQ operations and current haulage movements along Seaham Rd. The EIS does not indicate any risks or long term effects from air-borne pollutants/dust that may occur due to the increase in activities of concrete recycling and batching plant.

Similar to noise issues, Hanson's EIS only indicates that they will prepare an Air Quality Management plan "post approval" if deemed necessary



## Cultural heritage - Historic

Whilst the EIS references that the subject site has no cultural or heritage significance, the proposed BHQ expansion encompasses a haulage route along Seaham road which, will impact the existing characteristics of the small hamlet of Nelsons Plains.

Prior to early settlement, Nelson Plains was occupied by the Worimi Aboriginal people. The area consists of rich farmland and flood plains which are bound by the Williams and Hunter Rivers.

Land grants for Nelsons Plains date back to the early 1800's where farming, dairying and shipbuilding were the main economic drivers for the region.

Nelsons Plains is still an important farming hamlet of the Port Stephens LGA and the continuity of farming operations and the rural character of the area will be significantly impacted by the additional haulage movements along Seaham Road.

## Socio-Economic

The EIS claims that the proposed expansion places no social or economic constraint on the local community indicating that the expansion provides security in the supply of construction materials for the Hunter & Central Coastal.

The EIS also references the significance of the construction industry's contribution to the National GDP (2008-2009) of 6.8%.

Agricultural and in particular beef production (in Australia) also plays a vital role in contributing to Australia's social, economic & environmental sustainability.

There is a steady rise in the demand for safe and high quality beef which is combined with Australia's focus on meeting consumer needs. (Nff.org.au).

Australia is the 2<sup>nd</sup> largest beef exporter in the world (Meat and livestock Australia, 2010) with a gross value of production (during 2009-2010) of 7.27 billion dollars (Australian Bureau of Statistics – value of Agriculture commodities 2009-2010. Cat 7503.0).

The Beef industry accounts for 50% of all farms with agricultural activities in Australia (Meat and livestock Australia, 2010).

On this basis, the BHQ expansion EIS forgoes any references to impacts to agricultural and farming activities along Seaham Rd Nelsons Plains.

## Conclusion

Whilst the actual BHQ site expansion does not directly affect our property, the projected increase of haulage movements along Seaham Road, Nelsons Plains will have a direct impact to many owners of properties along Seaham Rd, Nelsons Plains. Based on the issues outlined in our submission, we believe that Hanson need to carry out further investigations with regard to impacts on current agricultural activities, road safety, intersection capability, road conditions, current vehicle movements (Seaham Rd, Hinton Rd & Raymond Terrace Road), safety at bus stops, air and noise quality, speed limits, driver conduct and safe driveway access to properties. On this basis we deem that the EIS has not adequately addressed a lot of issues as outlined in our submission.



## **Annexure A**



**Seaham Rd – Nelsons Plains: heading Northbound towards Seaham** – This image shows change in speed limit from 100km to 90km. At this point there is only a 200 meter distance to the Hinton Road intersection – based on 20 years of use and observation; we regularly witness vehicles and trucks continuing at speeds of 100km past the 90km sign and well beyond the Hinton Road intersection.



**Nelsons Plains: Hinton road intersection facing south towards Raymond Terrace** – the topography of this section is downhill in the direction towards Raymond Terrace. This intersection has unstable pavement and narrow shoulders. There are no additional lanes for traffic to divert around turning vehicles – This is currently a dangerous intersection with limited visibility in all directions. The combinations of speed limits, visibility and pavement condition will increase risks of accidents, noise (due to brake compression). This intersection is also used daily by local school buses.





**Nelsons Plains: Eastern view from Ralston Road intersection to Seaham Road (Nelsons Plains) –** This road is used by residents (living in close proximity) as an alternative road for making U turns to avoid rear end collisions when entering driveways along Seaham Road. This road is unsealed, narrow, in very poor condition and has visual obstructions (power Pole). There are currently large pot holes near the entrance of the house at number 2 Ralston Road.



**Nelsons Plains: facing south at Ralston Road/Seaham Road intersection.** Both these locations are used for collection/drop off points for local school buses. Buses have limited shoulders to safely stop along this section of Seaham Rd. School children currently stand within 2 meters of the road shoulder line marking. The current speed limits of 90km for these locations are unsafe for school children and buses.

## ANNEXURE-B



Sydney, New South Wales to Brandy Hill, New South Wales 2324

Drive 176 km, 2 h 35 min



## Sydney

New South Wales

### Take Cahill Expy and Bradfield Hwy to M1 in Cammeray

- |   |   |                 |
|---|---|-----------------|
| ↑ | 1. Head east on King St towards Castlereagh St                      | 10 min (6.5 km) |
| ↩ | 2. Turn left at the 2nd cross street onto Elizabeth St              | 110 m           |
| ↑ | 3. Continue onto Phillip St   | 300 m           |
| ↘ | 4. Turn right onto Bridge St  | 350 m           |
| ↑ | 5. Continue straight  | 81 m            |
| ⤴ | 6. Use any lane to take the Cahill Expy slip road to Harbour Bridge | 46 m            |
| ↑ | 7. Continue onto Cahill Expy  | 250 m           |
| ⤴ | 8. Merge onto Bradfield Hwy/Sydney Harbour Bridge                   | 1.2 km          |
|   | <a href="#">Continue to follow Bradfield Hwy</a>                    | 1.7 km          |
| ↘ | 9. Keep right to continue on Bradfield Hwy/Warringah Fwy            | 400 m           |



- 🔙 10. Keep left to stay on Bradfield Hwy/Warringah Fwy

⚠️ Partial toll road

⚠️ Parts of this road are closed Mon–Fri 6:00 – 10:00 AM

2.0 km

**Continue on M1 to Artarmon. Take the exit for Pacific Hwy/A1 from M1**

4 min (4.0 km)

- ⬆️ 11. Merge onto M1

2.5 km

- 🔙 12. Use the left 2 lanes to take the Pacific Hwy/A1 exit towards Chatswood/Newcastle

⚠️ Partial toll road

1.5 km

**Get on Pacific Mwy/M1 in Cowan from B83**

45 min (29.8 km)

- ➡️ 13. Use any lane to turn right onto Pacific Hwy/A1

10.8 km

- ➡️ 14. Turn right onto Turramurra Ave

550 m

- 🔙 15. Turn left onto Brentwood Ave

210 m

- 📍 16. At the roundabout, take the 3rd exit onto Eastern Rd

2.0 km

- 🔙 17. Turn left onto Junction Rd

📍 Go through 1 roundabout

1.5 km

- ⬆️ 18. Continue onto Edgeworth David Ave

1.1 km

- ➡️ 19. Turn right onto Sherbrook Rd

📍 Go through 1 roundabout

850 m

- 📍 20. At the roundabout, take the 1st exit and stay on Sherbrook Rd

27 m

- 📍 21. At the roundabout, take the 2nd exit and stay on Sherbrook Rd

1.2 km

- ⬆️ 22. Continue onto Royston Parade

1.1 km

- ⬆️ 23. Continue onto Belmont Parade

280 m

- 🔙 24. Turn left towards Pacific Hwy/B83

75 m

- ➡️ 25. Use any lane to turn right onto Pacific Hwy/B83

8.6 km

- ⬆️ 26. Use the right 2 lanes to take the slip road to Pacific Mwy/Gosford/M1/Newcastle

1.6 km

-  27. Merge onto Pacific Mwy/M1

1 h 5 min (113 km)

**Continue on A1. Take Woodberry Rd, Raymond Terrace Rd and Seaham Rd to Brandy Hill Dr in Brandy Hill**

19 min (22.9 km)

-  28. At the roundabout, take the 3rd exit onto John Renshaw Dr/A1

1.8 km

-  29. Use the left lane to merge onto New England Hwy/A1/A43


850 m

-  30. Take the exit towards Anderson Dr/Woodberry/Beresfield


600 m

-  31. Turn right onto Anderson Dr


120 m

-  32. Turn left onto Woodberry Rd

2.3 km

-  33. Turn right to stay on Woodberry Rd


4.9 km

-  34. At the roundabout, take the 2nd exit onto Raymond Terrace Rd

4.3 km

-  35. Turn left onto Seaham Rd

6.3 km

-  36. Turn left onto Brandy Hill Dr

1.7 km

## Brandy Hill

New South Wales 2324

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.