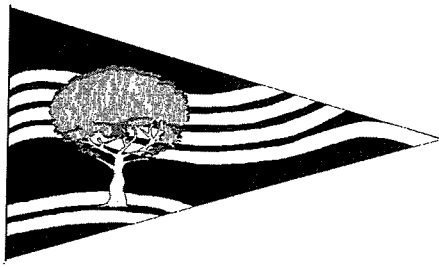




PCU061368



**Pennant Hills District Civic Trust Inc.**

*'Preserving the residential amenity of Pennant Hills and its environs'*

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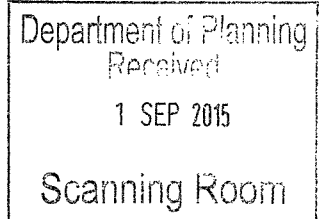
[secretary.phdct@gmail.com](mailto:secretary.phdct@gmail.com)

August 31, 2015

Director of Infrastructure Projects  
Department of Planning & Environment  
GPO Box 39  
Sydney, NSW 2001.

Dear Ms Jones,

Subject: **Hornsby Quarry SSI 15 7066**



Thank you for the opportunity to make a submission on this subject.

The Trust accepts the idea of rehabilitating the Hornsby Quarry site on the understanding that it will be wholly used for recreation purposes, recognizing the extent of high-rise residential development in central Hornsby, both existing and planned.

However we also understand that, from the numerous studies conducted under the auspices of Hornsby Council over the past 20 years, this is an extremely complex site and therefore we trust that this EIS process will properly consider the wealth of expert opinion already available.

This complexity includes the question of site access. We submit that the proposed development and use of Bridge Road as the principal access way is a serious safety concern, considering the very steep incline, tightness of the bends and the prospect of up to 35 trucks per hour each way. Quarry Road was for good reason the access way over 100 years of quarry operations, and it will likely be the preferred access way to the eventual rehabilitated site being closest to Hornsby's population centre and transport facilities. We submit that the Quarry Road option, or at least the alternative of 'in one way and out the other', should be carefully reconsidered.

**Spoil Sourcing and Haulage Routes are, however, the Trust's principle issue.**

1. The advent of government Federal, State and Council funding commitments toward the Hornsby Quarry as a NorthConnex spoil disposal site should not override the Spoil Management Strategy (the Strategy) requirement under NorthConnex Planning Approval. From our enquiries the Strategy is still under development but has to be approved by NSW Planning "*prior to the commencement of tunneling works*". .

Our understanding is that such a strategy will consider the impacts on traffic and local residents as well as the availability of disposal sites, and the practicality on haulage contracting. NorthConnex

EIS Table 8.29 accepted under the Planning Approval says “*spoil transport to the disposal sites would be via Pennant Hills Road, the Hills M2 Motorway & the M1 Pacific Motorway. Transport beyond the Hills M2 Motorway and the M1 Pacific Motorway would be subject to the assessment and approval of those other sites to receive spoil materials*”.

This last sentence is where this EIS comes in, and this EIS should only be concerned with spoil transport after it leaves the major roads mentioned above. Specifically in this case Pennant Hills Road and the M1 in the vicinity of Pearce's Corner, Wahroonga. For example, the EIS proposal for spoil transport from the Northern Interchange and the Northern Portals sites to take an extravagant M1 ‘turning circle’ route to get to this point is beyond the scope of the EIS.

Similarly the proposal / suggestion that these two sites be dedicated to supplying spoil to the Quarry is also beyond the scope of this EIS.

In summary we submit that this Hornsby Quarry EIS, in so far as it overrides the NorthConnex Planning Approval and preempts the NorthConnex Spoil Management Strategy on the grounds of proximity and the government funding contribution, is unacceptable.

2. The EIS introduces the concept of ‘*northern and southern construction sites*’ by way of supporting the proximity argument. This concept is seen as contrary to the above Table 8.29 reference that implies a ‘*north / west versus south / east of Pennant Hills Road*’ division, with one side transporting spoil north on the M1 Pacific Highway and the other south on M2 Motorway.

Assuming the acceptance of the Hornsby Quarry as a disposal site it is therefore reasonable to conclude that the ‘north / west’ construction sites (ie. the Southern Interchange and Wilson Road sites) should supply the spoil for the Quarry (ie. a combined volume marginally greater than the EIS’s suggestion to utilize the spoil generated from the Northern Interchange and Northern Portals sites. A suggestion that is outside the scope of a Quarry assessment – see 1 above).

3. Referring to the LLBJV Traffic Management and Safety Plan we submit that the introduction of ‘*new signalized intersections*’, close to the Pennant Hills Road intersections with the M2 and M1 Motorways, is a further preemption of the Strategy and should be seriously questioned within the Spoil Management Strategy approval process.

These new intersections would seem to be introduced to enable spoil from the two Interchange construction sites to be transport north or south respectively by crossing Pennant Hills Road rather than converging with the traffic travelling along Pennant Hills Road.

These new intersections will be highly disruptive to traffic already extremely inconvenienced particularly during the peak periods, that is, two three hour periods or 6 of the planned 11 hour operating day.

We submit that, without an approved Strategy and a determination on disposal sites, these new intersections are highly questionable.

4. Furthermore the LLBJV Traffic Management and Safety Plan introduces new ‘*turning circles*’, one through Pennant Hills / West Pennant Hills streets (using Boundary Road / Victoria Road / New Line Road / Castle Hills Road) and one around the Thornleigh industrial precinct (using Duffy Avenue / Chilvers Road / Sefton Road / Dartford Road).

We submit that the identification of these '*turning circles*' is a further preemption of the approved Strategy required by the NorthConnex Planning Approval.

The Hornsby Quarry EIS further proposes an extravagant '*turning circle*' using the M1 and Mount Colah streets for the transport of spoil from the '*northern constructions sites*', based on the proximity argument, but this circle covers a greater distance than travelling south to the M2.

We submit that, without a determination on disposal sites, this turning circle (that depends on the 'new signalized intersection' covered above) is highly questionable with its basis related solely on the Hornsby Quarry proximity argument rather than a total strategy.

5. Referring to the EIS's specific haulage route details:

**Northern Interchange compound (NIC):**

- see 'northern construction sites' – EIS ref. 4.3.1
- this plan is dependent on a 'new signalized intersection' discussed above
- the NorthConnex EIS indicates 52 to 58 trucks per peak hour accessing this intersection and these numbers are repeated in the LLBJV Traffic Management and Safety Plan
- in-bound – as opposed to the proposed 'Mt Colah turning circle' why wouldn't the Pacific Highway south to Bridge Street be preferable? The proposed Bridge Street access way to the quarry site is north of central Hornsby and the approach to central Hornsby from the north is much less busier than from the south. Why isn't the Pacific Highway south to Bridge Road an acceptable route?
- out-bound – the non-peak route needs to include the M1 Pacific Highway in order to access the 'new signalized intersection' to access the NIC site
- the out-bound proposal includes different peak / non-peak routes to return trucks to Pennant Hills southbound, but the in-bound proposal does not include different peak / non-peak routes. Therefore we question whether this peak / non-peak distinction is really necessary?

**Other Northern construction sites:**

- see 'northern construction sites' – EIS Ref. 4.3.1
- in-bound – the proposed route is nonsensical for both Trelawney Street and Wilson Road
- out-bound – see the second point and question above regarding the peak / non-peak distinction.
- re the **Trelawney Road** compound (assumed to be a '*northern construction site*'):
  - if considered a 'northern construction site' - all trucks out-bound to the Hornsby Quarry would need to exit on to Loch Maree Avenue and immediately turn right at the busy intersection with Pennant Hills Road
- We submit that this proposal is not satisfactory and that this site should be entered and exited in a southerly direction on Pennant Hills Road.

**Wilson Road** compound (assumed to be a '*southern construction site*') :

- as mentioned previous, the out-bound proposal includes different peak / non-peak routes to return trucks to Pennant Hills southbound, but the in-bound proposal does not. Therefore the question as to whether this peak / non-peak distinction is really necessary?

## 6. Site specific haulage contracts

- if this is a major issue in determining the NorthConnex Spoil Management Strategy then we might understand the '*new signalized intersections*' and the EIS's conclusion that '*the spoil from the Northern Interchange compound and the Northern Portals could be solely handled and reused at the Hornsby Quarry*'. However our concerns about these intersection under 3 above remain, as does our preferred north / south haulage routes in 2 above.
- however, by the same token re haulage contracts, we submit that Wilson / Trelawney sites should be contractually linked. Wilson Road trucks transporting could spoil northward on Pennant Hills Road to the Hornsby Quarry returning southbound to access the Trelawney Road site and transport spoil to a disposal site to the south, before returning to complete the circular route at Wilson Road.

We will need to know why such an outcome is not achieved, and the 'turning circles' mentioned in 4 above avoided.

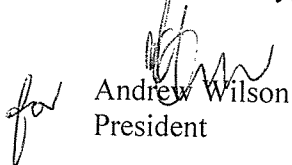
## 7. Truck Numbers

- the EIS tells us that up to 37 trucks per hour, more than one every two minutes, will be unloading up to 1.5m cubic metres of spoil at the Quarry site. We submit that this is an unrealistic expectation.
- in comparison, the NorthConnex EIS and the LLBJV Traffic Management and Safety Plan tells us that up to 720 trucks per day (say 60 per operation hour) will transport 743170 cubic metres from the Northern Interchange compound.
- the trucking hours and duration of operations are seen to common to both sites.

Although the 60 may include material deliveries to the site we submit that the disparity in the above numbers must be explained in detail.

**In summary** the Trust sees the subject EIS as overriding the NorthConnex Spoil Management Strategy and therefore the NorthConnex Planning Approval, and as such might be described as the tail wagging the dog. The Trust believes that this EIS should concern the establishment of the Hornsby Quarry to receive and handle excavated spoil, and that NorthConnex spoil management is a separate issue. The implications of this very significant spoil transport load through our streets is a serious concern, and therefore this submission on behalf of our members and the Pennant Hills district community generally.

Yours sincerely,

  
Andrew Wilson  
President

cc. Hon Matt Kean, MP for Hornsby  
Hon Damien Tudehope, MP for Epping