

Our Ref: 222/583 (1259150)

Phone Enquiries: 4934 9700  
Scott Henderson

24 November 2016

Mr Howard Reed  
Director Resource Assessments  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Howard

**Re: SUBMISSION ON THE MARTINS CREEK QUARRY EXTENSION PROJECT (SSD 6612)**

I am writing to provide comments on behalf of Council in relation to the Environmental Impact Statement on public exhibition for Martins Creek Quarry Extension Project (SSD 6612).

Maitland City Council at its meeting of the 22nd November resolved to make a formal submission in response to the exhibition of the EIS. The issues raised in the following submission are as a result of that resolution. Council also specifically resolved that their *'submission include consideration of increased rail haulage to limit the number of trucks on the local roads along the haul route'*.

Council acknowledges the main access route through the Maitland LGA being Route 1 (EIS Vol. 2 Appendix H - SECA Solution Traffic Impact Assessment August 2016): Martins Creek Quarry – Grace Avenue – Dungog Road – Gresford Road – Tocal Road – Patterson Road – Flat Road which then connects to the state road network Melbourne Street – New England Highway.

The main impacts likely on the Maitland LGA relate to increased heavy vehicle movements as a result of increased production. Consultation and discussion with Council has focussed on:

- traffic volumes
- haulage routes
- road classification
- design traffic volumes
- capital works program
- road condition / alignment
- proposed works / development
- specific traffic issues in the Maitland LGA
- restrictions / limits.

Council has previously provided input to the Department in relation to the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of the Environmental Impact Statement (EIS) and have also participated in various community consultation processes to date.

Council considers the following potential impacts to result from the proposed extension project.

## **POTENTIAL IMPACTS**

### **Traffic volumes**

Since Buttai Gravel commenced operation of the Quarry in 2012, the increase in heavy truck volumes has resulted in increased complaints from residents regarding truck noise and road safety. It has been suggested that up to 600 truck movements in one day were occurring when the quarry was operating on its last major project.

Residents complained about truck noise and road safety that stemmed from this project. The five areas of contention were:

- the volume of trucks
- the early morning start and the continuing of the noise throughout the day
- the truck noise created by the pavement condition
- noise from empty trucks
- road safety in built up areas.

### **Truck volume noise**

Notwithstanding the suggested limitation of 215 one way truck movements per day, the proposed volumes of 430 truck movements per day (two-way) is still considered high. The proponent is justifying the movements from historical figures of truck movements in the Traffic Impact Assessment (TIA) (Table 2.7) based on a six day week over 50 weeks.

Using this reckoning to move 1.5 million tonnes would work out at an average of 308 (two-way) truck movements per day. The effect of 120 less truck movements a day would reduce complaints about the number of trucks travelling in built up areas. This would be closer to Council historical figures of heavy vehicle movements for this class of road in a rural environment.

Historically the Flat Road haulage route on an average takes only 61% of the product, the number of trucks to move this volume of material would be 188 two-way truck movements.

The issue is when the quarry has a contract to supply material to a project. The contract is driven by a timeline and the quarry under its own estimation can move 10,237 tonnes per day or 640 truck movements at peak capacity. It is at these volumes that the residents along the route are most affected by as nearly 3.5 times as many trucks could be on the Flat Road haulage route.

The proponent has commented on the truck noise issue and from their noise monitoring study (EIS Vol. 2 Appendix I - Acoustic Assessment For Proposed Quarry Expansion Martins Creek Quarry August 2016) have indicated that there will be no significant noise level increase caused by additional truck movements.

The Assessment however fails to provide details of the location and offset of the monitors from houses. This was nominated on Page 21 Section 5.3.1 Measured Traffic Noise Levels".....A detailed discussion of this is presented in Section 5.5.8" however there is no Section 5.5.8 in the Report.

Information has been provided elsewhere in the report on the existing roads around the quarry but not on the haulage route.

Three noise monitors were placed in Paterson and one at Bolwarra Heights. Readings in Paterson on Gresford Road were adjacent to businesses and houses the readings appear inconsistent when compared to monitor readings on Tocal Road, Bolwarra Heights, adjacent to rural residential housing. Without details it is difficult to assess the impact on the Maitland residents and indeed if the monitoring is representative of the impact of noise on this haulage route.

This monitoring should be carried out again at locations that are representative of the typical environment on this road where noise would likely to be an issue. The monitor location on Tocal Road would not be considered representative of noise levels for residents on Tocal Road.

Buttai Gravel have quite recently instigated a self-imposed reduction in operating hours due to complaints received about noise and truck volumes. This resulted in trucks delaying entry to the township of Paterson until 6.30am, one full hour later than their now proposed haulage operating time. This had a flow on affect to other residential clusters on the route especially Bolwarra Heights and Lorn, reducing the amount of complaints regarding the 5.30am start time from most of the residents. The monitoring has been assumed to be done under these conditions.

The EIS indicates that this will continue as an internal policy and code of conduct for drivers, however Council has not seen any document details.

Council requests that:

- the vehicles be maintained on a regular basis to reduce engine and exhaust noise
- use of compression braking not be used on Paterson and Tocal Road residential areas (60kph and less speed zones).

#### **Truck noise created by road pavement**

Noise from existing road pavement was another issue raised by residents, generally caused by the road surface, but also nuisance truck engine noise associated with early morning operating hours and continuing during the day when operating at increased haulage rates.

Noise has been reduced by the resurfacing and reconstruction of the pavement wearing course by Council.

This will need to be strictly monitored to maintain the current pavement noise levels and may require more regular resurfacing treatments, should the pavement deteriorate and noise levels increase.

Council, with a suitable contribution from Buttai Gravel, should be able to provide a reasonable road surface over the life of the quarry to reduce road pavement noise. This however is subject to negotiation of an acceptable Voluntary Planning Agreement, of which very little detail has yet been forthcoming.



### **Noise from empty trucks**

The road pavement improvements and maintenance will go a long way to improve this however vehicle maintenance should also be extended to the trailer, bogey and tailgate to be possibly fitted with dampeners to reduce noise generated by empty trailers.

### **Road safety**

Issues have been raised about road safety, and, the number of heavy vehicles and speed in the narrow section of Tocal Road north of the Paterson Road intersection.

Council has undertaken the following:

- resurfaced this section of the road
- relocated the school / public bus stop
- constructed additional footpath paving
- delineating the travel lanes with pavement markings
- raised pavement markers
- implemented a restriction of no parking on the shoulders through this section which has widened the travel width of the pavement to 9 metres.

Martins Creek Quarry have:

- introduced a self-imposed speed restriction in response to community concerns to address the perceived road safety issue at choke points at Paterson and Bolwarra Heights.
- indicated that this will continue as an internal policy and code of conduct for drivers, however Council has not seen any document details.
- indicated that the road width is diminished at Paterson Road and may be a safety issue for their trucks.
- acknowledged that parking restrictions and works undertaken by Council have improved the safety in this narrow section of the haulage route.

### **Traffic congestion**

The operators have indicated that their normal truck movements will be restricted to 430 two-way movements a day with a morning peak of 40 laden trucks per hour. There is some concern over the resulting hourly volume and its implications on the queuing of commuter traffic at the intersection of Pitnacree Road and Melbourne Street, East Maitland.

The stacking of trucks at the intersection and their ability to move off within a reasonable time will have an impact on normal traffic flows. This needs to be investigated and assessed during normal truck movements, truck movements at maximum extraction and at peak hour haulage rate to determine the stacking of trucks and their impact on queuing at these traffic signals.

### **Road maintenance**

The heavy vehicle traffic will have an impact on Council roads and the annual contribution to the maintenance of Maitland City Council sections along the haulage route. The defect report shows isolated pavement defects that will require monitoring and maintenance intervention.

The maintenance value determined by Council is through the current Extractive Industries Contribution Plan. By applying this methodology \$56,000 per annum would be an appropriate contribution to maintenance works of Council roads rather than the sum of \$2,189 per annum proposed by Buttai Quarries.

### Rail haulage

In light of the potential impacts associated with traffic noise and congestion generated by the expanded quarry operation proposed, consideration should be given to increased rail haulage to limit the number of trucks on the local road along the haul route.

Those major projects likely to result in the quarry operating at high output volumes should be candidates for consideration of transporting material by rail. Where the quarry is operating near / at peak demand, then projects should consider the environmental cost and also undertaken a project cost evaluation to determine the viability of moving material by rail.

### MITIGATING IMPACTS

Council requests consideration of the following measures to mitigate the impacts of heavy vehicle road transport through the Maitland LGA:

1. The quarry operator prepare a Transport Management Plan (TMP) in consultation with Maitland City Council to minimise the traffic impact on residents located along designated access routes to the quarry.

*Reason: A statement of the conditions of travel to heavy vehicle operators travelling to/from the quarry.*

2. The heavy vehicle operator use rail services where possible, and should be required to undertake project cost evaluations for use of rail transport associated with major projects above a specified dollar value.

*Reason: Stockpiling & intermodal freight transport usage may result in double handling however these costs may be offset for major projects. Rail transport will further minimise road transport environmental effects of residents, and the road traffic network.*

3. Maitland City Council seeks a road maintenance contribution of \$56,732 per annum, indexed annually, associated with the heavy vehicle traffic generated by the quarry.

*Reason: Council's apply a road maintenance contribution to quarry operators that generate heavy vehicle traffic on Council's local road network.*

4. Limit heavy vehicle travel speed during early hours through built area of Bolwarra / Bolwarra Heights and Lorn.

*Reasons: (a) Heavy vehicle traffic associated with the quarry travelling at early hours through built up areas such as Bolwarra/ Bolwarra Heights where dwelling setbacks from the main road are 15m to 20m. (b) Empty trucks travelling to the quarry are more likely to cause higher traffic noise at higher speeds, (c) Heavy vehicle especially laden vehicles may cause excessive vibration on nearby dwellings.*

5. Travel conditions such as limiting travel speed by agreement with local Council's where issues are raised through government agencies associated with school traffic, and child cares centres and aged care centres and the like along the identified access routes.

*Reason: To ensure road safety around school, and ensure that environmental amenity is maintained.*

6. Limit heavy vehicle volumes to specific periods of the day to minimise impact on residents and road traffic service levels.

*Reason: Peak heavy vehicle traffic generation associated with the quarry may occur for extended periods during major projects may cause noise above statutory thresholds (e.g. Bolwarra/ Bolwarra Heights) and may impact on the service levels of part of the road network (Melbourne Street East Maitland signals at Pitnacree Road and at New England Highway).*

7. Heavy vehicle operators that provide services to the quarry maintain their vehicle fleet on a regular basis, and the use of compression braking not be used in the Paterson and Tocal Road residential areas (60kph and less speed zones).

*Reason: To reduce engine and exhaust noise.*

8. Encourage the quarry to use Performance Based Standards (PBS) heavy vehicles with routes for these vehicles approved through the National Heavy Vehicle Regulator (NHVR).

*Reason: To minimise non-compliance of heavy vehicle operators with road and travel conditions.*

9. Heavy vehicles are permitted to operate at PBS Level 1 General Mass Limits (GML) up to but not exceeding 50.5 tonnes Gross Combination Mass along Belmore Road Lorn and Paterson Road Largs, subject to posted local restrictions.

*Reason: General access on all roads includes Roads & Maritime Services controlled bridges subject to load limits that form part of the local road network in the Maitland local government area. A 50.5 tonne load limit applies to Belmore Bridge over the Hunter River and Dunmore Bridge over the Paterson River.*

10. The quarry operator / heavy vehicle operators are to comply with the requirements of Roads and Maritime Services.

*Reason: State roads are under the care and control of Roads & Maritime Services, and Roads & Maritime Services are asset owners of state bridges in the Maitland local government area.*

Please note that Martins Creek Quarry Action Group has made representation to Maitland City Council regarding the subject quarry development proposal. The Action Group's requests for consideration are provided as Attachment 1.

Should you to discuss the matter further please call Stephen Hawes, Manager Infrastructure Planning & Development Engineering on 02 4934 9807.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. James', with a stylized flourish at the end.

**Chris James**  
**Group Manager Infrastructure and Works**



## ATTACHMENT 1

Martins Creek Quarry Action Group requests:

- (a) Request that an amenity impact assessment be carried out as required for in the SEARSS
- (b) Request that Noise Impact Assessment background data exclude existing truck movements, to reflect the true background noise levels.
- (c) Request that any new consent issued in this planning process limit operating hours to 7am to 5pm Monday to Friday in accordance with the DSC 1991 consent to ameliorate existing community impacts.
- (d) That the existing 1991 consent condition which requires 70% of product be exported by rail be requested to remain with any new consent issued in this planning process.