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The General Manager Clarence Valley Council Locked Bag 23, GRAFTON NSW 2460

Attention:- Renan Solatan, Development Engineer

13 December 2016

RESPONSE TO DRAFT DEVELOPMENT CONSENT CONDITIONS FOR MODIFICATION OF EXTRACTIVE INDUSTRY (SHERIDANS HARD ROCK QUARRY – DA2014/0098) 242 FAHEY'S & BULGINS ROAD, HERNANI

Dear Renan

Please find attached our response to the DRAFT Development Consent conditions being levied on the above development.

This response pertains only to the following conditions outlined in Council's report to the JRPP being:-

- Completion of a Road Pavement Impact Assessment for the haulage route.
- Traffic Impact Assessment for the intersection of the Waterfall Way and Bald Hills / Hernani Road.

Road Pavement Impact Assessment for the haulage route.

If the client maintained their original land use operation the requirement to complete a pavement impact assessment would not be required or fall upon Clarence Valley Council (CVC) as this landuse operation would not require a development application.

This requirement for the client is onerous based on the haulage route has more than likely reached its design life end of 15 to 20 years (flexible pavement) some time ago before the quarry operation commenced. Any requirement to upgrade should rest with CVC based on the above criteria alone.

The quarry has since upgraded sections of the haulage route both as a requirement of the development consent and as a result of providing a safe / operational haulage route over and above the CVC requirements.

Providers of Road Safety Auditing & Traffic Management Design & Assessment Services for the Civil Design & Construction Industry CVC receives a royalty payment from the quarry based on the tonnage output for road maintenance. However, it is not binding upon CVC to spend this money on maintenance for the haulage it could be expected a large percentage be allocated to maintenance of the haulage route due to the geographical location within the council boundaries.

<u>Traffic Impact Assessment for the intersection of the Waterfall Way and Bald Hills /</u> <u>Hernani Road</u>

The following assessment details have been extracted from RoadNet's 2010 & 2014 TIA's completed for the quarry operation.

- Original rural farming operation (potatoes) generated over 1000 heavy vehicle movements per year including semi-trailers and B Doubles with a gross weight up to 65 tonnes. <u>This equated to 63 trips per day with over half these trips being</u> <u>attributed to existing residences in the area.</u> Section 5 of the RoadNet 2014 TIA explains this in detail taking into account offsets for the prior landuse and the current quarry operation.
- The expansion of the quarry will only now generate a similar amount of movements as the original farming operation.
- The capacity assessment completed for the haulage route in section 6 of the 2014 TIA indicates the existing road formations generally conform to the Austroads requirements. Since this report a further 3 passing bays have been constructed in accordance with the development consent conditions.
- In the 2010 TIA it indicated the Waterfall Way and Bald Hills / Hernani Road intersection would operate at a level of service (LoS) of A based on 1000 vpd on the Waterfall Way. Allowing for traffic growth of 1.5% per year this volume would be become approximately 1100 vpd in 2016. It can be expected with some increase in traffic on Bald Hills / Hernani Road the intersection would still operate at a LoS of A to B with acceptable gap acceptance for turning traffic.

It is also noted in the report to the JRPP the Roads and Maritime Services has advised Council it has no issues with the increased traffic to be generated by the expanded quarry operation as it falls within the operational capacity of the Waterfall Way.

In previous documentation submitted to CVC it has been advised the haulage route can cater for up to 500 vehicles per day. The quarry expansion will allow for a daily average of 132 laden and unladen movements per day. 27% of the roads capacity.

In summary to this response it is noted numerous Traffic Impact Assessments, Clarification of Information provided and responses to issues raised by CVC have been addressed in accordance with prescribed traffic engineering practices. The DRAFT consent conditions dealt with in this response are considered to be onerous on this landuse operation in this locality considering the history of the haulage route and the fact the quarry expansion will operate under the prescribed traffic engineering requirements.

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It shall also be noted our position in relation to these issues has not changed since our last response to CVC, September 2016 for which we have not received a response / clarification from CVC since.

It is therefore requested that this response be considered for any future approved development consent conditions.

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Craig Nethery (Director) StreetWise Road Safety & Traffic Services Pty Ltd

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