



Our Reference: DOC16/474769
Contact: Scott Ensbey

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

22 SEP 2016

Attention: Pat Ridgeway

Dear Pat

Development Application MOD2016/0035: Modification of DA2014/0098 (increase of permitted daily truck numbers), 242 Fahey's & Bulgin's Road Hernani NSW.

I refer to the above proposal referred to the Environment Protection Authority (EPA) for comment on 24 August 2016. The EPA has reviewed the proposal and provides the following advice, noting that the EPA's regulation of the activities from the quarry is limited to the activities conducted within the quarry premises, bound by Environment Protection Licence No 20077.

The proposal to increase haulage from the quarry to 66 loaded trucks per weekday and 36 loaded trucks per Saturday is approximately a 230% increase on the current limit of 20 trucks per day. This increase has the potential to impact on the amenity of local residents along the haulage route, including the Waterfall Way.

The following modelling assumptions are used in the Traffic Noise Impact Assessment referred to by the proponent in the Statement of Environmental Effects:

- a) The modelling appears to be based on loaded trucks travelling no more than 15km/h with no breaking permitted past receivers 1 and 2. It is questioned how realistic this scenario actually is, and how these restrictions will be enforced;
- b) The selection of only 2 receivers on the immediate haul route (Cornels Rd and Fahey's Rd) where quarry traffic is the primary noise source does not appear to adequately represent the acoustic environment on other roads to be impacted by the proposal. This is particularly pertinent noting that trucks will be travelling far in excess of 15km/h and required to break heavily and frequently given the local terrain traversed by other haul routes. The EPA recommends that additional justification be provided as to why additional receivers on regular haul routes were not considered. If this cannot be adequately justified, the selection of additional and appropriately located receivers should be required, and Traffic Noise Impact Assessment updated. The proponent should refer to the 'NSW Road Noise Policy, Appendix B – Measurements and preparing a noise assessment report' (DECCW, 2011).
- c) With the issues outlined in a) and b) aside, the modelling suggests that up to 6 loaded trucks per hour would be possible, whilst still complying with road noise criteria. Whilst it is not made clear in the noise report, it is assumed that six loaded trucks per hour is at or near the upper limit of movements before the acceptable road noise criteria of 55 dB(A) is exceeded.

This issue alone appears to leave little to no margin for any discrepancy between modelled and actual noise levels or model error, and may result in unacceptable noise impacts on the community.

The EPA recommends that the proponent be asked to address these concerns, and/or that Council factor them into its planning determination. This is particularly important given the history of community concern with regard to the haulage of quarry trucks along the Waterfall Way (including the township of Bellinghen).

If you have any questions regarding this matter, please contact Scott Ensbey of the EPA's Grafton office on 66402522.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Graeme Budd', with a large, stylized initial 'G'.

Graeme Budd
Head, Environmental Management Unit – North Coast
Environment Protection Authority