

8 March 2021

Ref: 2523 DA1 007

Noreen Vu
Executive Leader
Environment, Strategic Planning & Community
Coonamble Shire Council
Via email: council@coonambleshire.nsw.gov.au

Dear Noreen

RE: DA027/2020 – Proposed Extractive industry at Lot 82 DP820705, 4948 Tooraweenah Road, Mount Tenandra, NSW 2828, being the Ralston Quarry. Traffic Information.

Groundwork Plus Pty Ltd continue to act on behalf of the applicant for the proposed Ralston Quarry located at the above-mentioned site. We provide further information to Coonamble Shire Council (Council) relating to traffic for the proposal as an addendum to the previously submitted Environmental Impact Statement (EIS).

Background

The EIS submitted for the proposal was supported by a Road Transport Assessment (RTA). Our letter of response to matters raised in public submissions (Our ref: 2523 DA1 005) reiterated that the RTA was prepared by a suitably qualified person and addressed the matters required by the Environmental Assessment Requirements for the proposal.

Inland Rail Project (IRP) Narromine to Narrabri (N2N)

The IRP N2N alignment is adjacent to the proposal (refer Attachment 1).

Gilgandra Shire Council requirements

Gilgandra Shire Council outlined certain requirements for the proposal by letter dated 19 February 2021. The applicant accepts the three (3) conditions proposed by Gilgandra.

Traffic Management Plan

As required by Gilgandra Shire Council and outlined in the EIS and RTA a Traffic Management Plan (TMP) would be prepared for the proposal. The TMP would of course clarify that trucks would not travel on roads closed by Council due to wet weather.

Haulage route

As outlined in the RTA, the anticipated primary haulage routes for the proposal are, North via Weenya Road, Tooraweenah Road and Goorianawa Road and South via Weenya Road and National Park Road.

As outlined in the RTA, direct access to the Inland Rail Project (IRP) Narromine to Narrabri (N2N) construction corridor is anticipated for Stage 1 of the proposal from the site and Tooraweenah Road heading North and National Park Road / Box Ridge Road heading South. This would minimise impacts to the local road network. However, as discussed recently with Council, until the IRP N2N is further progressed it is difficult to commit to a specific quantum of material that would be delivered to the alignment. We are of the view that it is appropriate to continue to rely upon the assessment provided in the RTA.

Access onto Weenya Road

As identified in the RTA, the proposed access onto Weenya Road is to be constructed to a rural standard BAL / BAR. No objection is held to a condition of consent for this matter.

Road upgrades

Section 5.3 of the RTA confirms that drivers on roads serving the proposal would continue to experience 'Level of Service A' during peak hours during operation of the proposal. Section 5.4 of the RTA confirms no capacity concerns regarding the future operations of the intersections as a result of the proposal generated traffic. Section 5.7 of the RTA recommends that *'subject to adequate design of the access road intersection with Weenya Road, no measures would be required to provide additional capacity to accommodate the Project traffic'*. Section 5.7 of the RTA also states that *'existing approved heavy vehicles routes are of an adequate standard to accommodate the Project heavy vehicles'*.

Nevertheless, we understand that Council holds concerns about the current condition of Weenya Road, Tooraweenah Road and Goorianawa Road which are unsealed rural roads. On that basis, the applicant voluntarily proposes:

- Prior to commencement of haulage on the local road network, Weenya Road would be upgraded to a suitable standard for a rural unsealed road; and
- Prior to commencement of haulage on Tooraweenah Road and Goorianawa Road a road dilapidation report would be undertaken and at the conclusion of Stage 1 the applicant would ensure that the condition of the roads are no worse than prior to the commencement of Stage 1.

Heavy Vehicles Contributions Plan

The applicant proposes a heavy haulage contribution of \$0.58/tonne (subject to indexation by the Consumer Price Index) hauled on the Coonamble Shire Council local road network. Payments would be made on a quarterly basis based on the amount of material hauled on the local road network. We provide the following information as justification for this proposed contribution rate.

We understand that Council does not have a Section 7.11 Contributions Plan for heavy vehicles. We have reviewed current contributions plans of Narromine Shire Council and Narrabri Shire Council and are of the view that they are comparable to the context and circumstances of Council. The current contribution rates are \$0.0584/t/km for Narromine and \$0.053/t/km for Narrabri. Which if averaged at a 10km haulage route would equate to \$0.58/t for Narromine and \$0.53/t for Narrabri.

In general terms, Narromine Shire Council outlines that the above rates were calculated on the following basis which we anticipate would be similar to the approach taken by Coonamble Shire Council to the maintenance of the rural unsealed road network.

All heavy vehicles contribute to the deterioration of road pavements. Australian Road Research Board (ARRB) research shows that an increase in the number of heavy vehicles using a road will accelerate the deterioration of a road, and lead to increased road maintenance costs being

incurred by Council. The impact of heavy vehicles on the condition of road pavements has been well documented by Austroads and other authoritative sources.

Council maintains the LGA's roads at an adopted level of service. As a result of a development using heavy haulage vehicles, Council will need to undertake increased maintenance work to maintain this level of service. The extent of the increased maintenance is dependent on the heavy vehicular traffic generated by the subject development.

Increased road maintenance results in an increased drain on Council's finances. Unless the subject development provides a contribution commensurate with the increased maintenance costs resulting from that development, the cost burden will be borne by the Council, and by implication, the wider community.

The costs of keeping roads in a satisfactory condition occur in three main areas:

- *Rehabilitation:*
 - *Regional sealed pavement rehabilitation;*
 - *Rural sealed pavement rehabilitation, and*
 - *Unsealed pavement rehabilitation/gravel resheeting or gravel patching.*
- *Reseals*
 - *Maintenance reseal (i.e. regional and local roads)*
- *Maintenance*
 - *Annual routine maintenance, and*
 - *Heavy patching or stabilisation of selected sections.*

Council maintains a mix of sealed and unsealed roads. These roads have been subdivided into three categories for the purposes of this Plan:

- *Regional sealed pavement;*
- *Local sealed pavement, and*
- *Unsealed pavement.*

Each road type has a different design life and maintenance requirements.

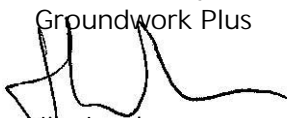
A sealed road incurs construction costs, maintenance costs and replacement of the wearing course over its design life. An unsealed road incurs ongoing costs for maintenance and gravel resheeting and heavy gravel patching, with additional work required if there is significant damage for natural events, such as flood events.

Conclusion

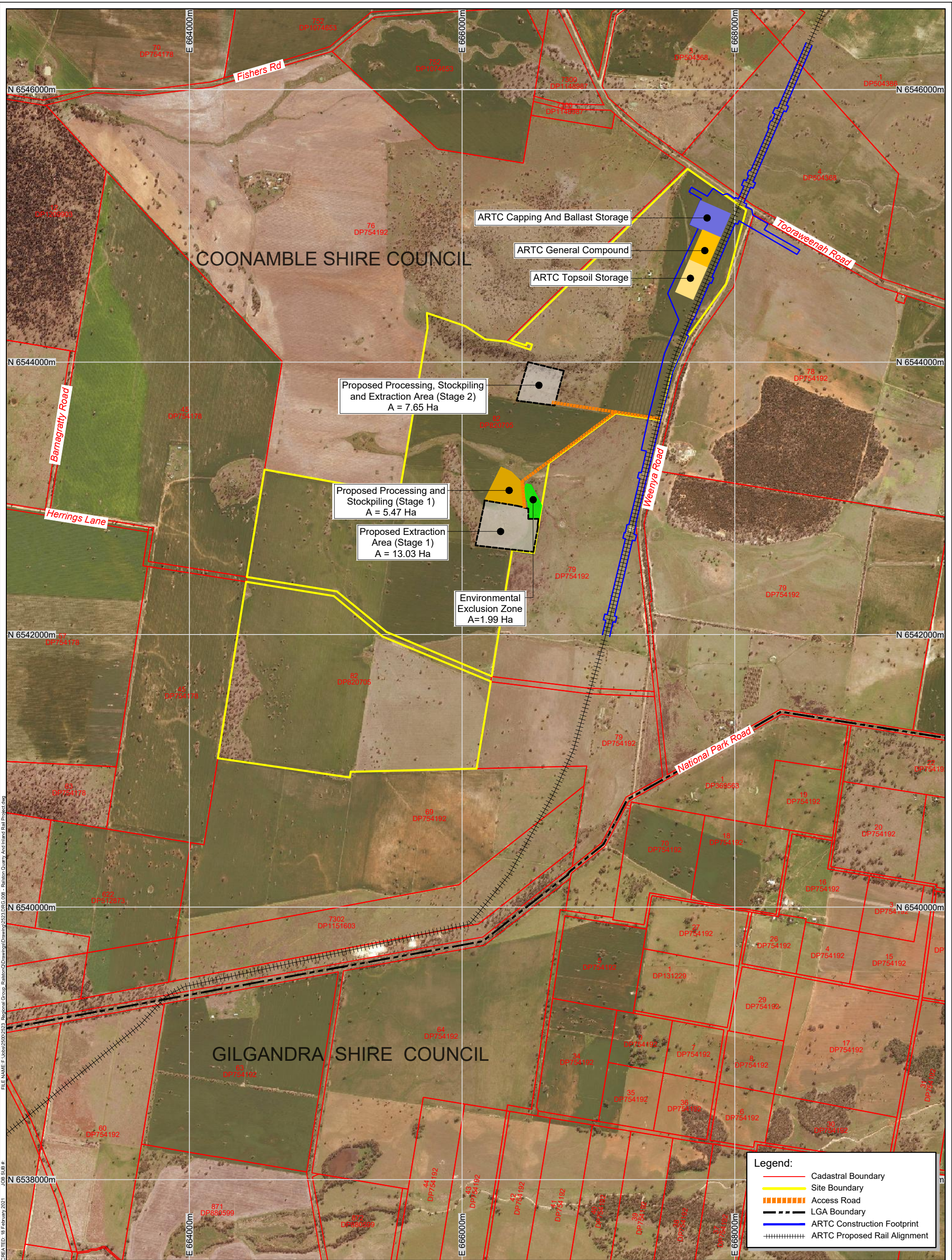
The RTA for the EIS advises that existing approved heavy vehicles routes are of an adequate standard to accommodate the Project heavy vehicles. Nevertheless, the applicant proposes that a traffic management plan, works on Weenya Road and monetary contributions to Council of \$0.58/tonne hauled on the local road network could address Council concern about potential impacts from proposal traffic to unsealed rural roads including Weenya, Tooraweenah Road and Goorianawa Road.

If you have any questions regarding these matters, please do not hesitate to contact me.


Yours faithfully
Groundwork Plus




Jim Lawler
Associate



REV		DESCRIPTION		DATE	BY
Data Sources:					
Photography: Google Earth Image Capture 2018-Dec-01					
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