

14 March 2017

Planning Assessment Commission
Commission Secretariat
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Attention: Alana Jelfs

Dear Alana

Subject: Gunlake Quarry Extension Project (SSD_7090)

With reference to your letter dated 27 February 2017, I provide the following comments:

Council does not normally deal with developments involving such significant volumes of heavy vehicles which is reflected in the haulage route standards within our Development Control Plan. While the community has ongoing reservations about such a significant increase in heavy vehicle traffic on local roads, Council acknowledges that the Austroads standards are designed to address the risk posed by such traffic volumes and types.

The Applicant's Transport Assessment in the EIS references Austroads and Council supports their use in this situation. Notwithstanding the resolution of Council on 16 December 2014 to accept a financial contribution from Gunlake towards road works on Brayton and Bypass [Ambrose/Red Hills] Roads, given the extraordinary volume and proportion of heavy vehicles on the route, Council would like to ensure the concerns around risk and safety for all users of the roads are adequately addressed in any development consent conditions and the Applicant's Statement of Commitments.

To that end, Council notes that according to Austroads, the width calculations for the haulage route would be:

- Brayton Rd: AADT 1,000 – 3,000 requires: 2 x 3.5m plus 2 x 2 m shoulders = 11m carriageway
- Ambrose Rd and Redhills Rd: AADT 500-1,000 requires: 9.2 -10m carriageway.

Neither roads wholly comply with the above, nor is this reflected in the Applicant's Transport Assessment.

The following reference to Austroads, is highlighted in relation to the need for an overtaking lane:

'Where an overtaking lane is warranted?

In deciding whether an overtaking lane is warranted, the evaluation needs to be carried out over a significant route length and not be isolated to the particular length over which the additional lane may be constructed.

*The basis for adopting an overtaking lane is the **traffic volume, %age of slow vehicles including light trucks and cars towing, and the availability of overtaking opportunities on adjoining sections.**'*

Therefore Council considers it appropriate to request the Applicant to engage a qualified and experienced traffic engineer to analyse and investigate the need and appropriate locations for overtaking lanes as per Austroads standards. Should the analysis determine an overtaking lane is required, the works should be the constructed at full cost to the developer.

The pavement condition is also a matter of concern, particularly in light of the existing evidence of pavement failure under the current conditions at the intersection of Red Hills Road and the Hume Highway. Given the proposed increased traffic volume Council needs to be satisfied the pavement can withstand the additional loads. A pavement analysis undertaken by a suitably qualified and experienced engineer would establish any initial pavement works required to ensure the safety of all road users.

In addition, ensuring the pavement has a minimum 10 year life under the proposed heavy vehicle volumes as a result of the development will positively contribute to the efficient use of relevant s94 developer contributions towards the maintenance of the roads. Therefore a condition of consent requiring the Applicant to undertake a pavement analysis and implement any initial works recommended by such an assessment is requested by Council.

Council acknowledges that matters outlined in the Statement of Commitments reflect the proposed commitments made in email correspondence from Ed O'Neill to Council on 23 August 2016. However, some statements could be clarified by including words to the effect '*all costs to be met by Gunlake*', to remove the ambiguity that may arise from commitments commencing with '*Work with the Council to...*'.

For example, one commitment states, "*Work with Council to identify hazards in the clear zone for 80km/h, including risk assessment and costing to correct or reduce the risk*". It should not be assumed that any identified hazards that are to be removed would be done so at Council's cost.

In relation to costing the extent of potential works discussed, without the engineering assessments referred to above, it would be difficult for Council to provide any comment at this stage.

Yours sincerely



Louise Wakefield
Director Growth Strategy & Culture