

Brandy Hill And Seaham Action Group

A committee of VOWW

Urgent Attention:

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Subject:

Local roads do not comply with current or proposed Brandy Hill Quarry Operations.

Our recent research reveals that the local roads, intersections and other infrastructure on the current and proposed quarry haulage routes are incompatible with both current quarry operations, and certainly those proposed in the recommendations of the Department of Planning, Industry and Environment (DPIE) to the IPC. Much of the above infrastructure does not meet the applicable government regulations, for L2 heavy vehicles, on roads that carry the current daily volume of vehicles, let alone the projected increased volumes

⁽¹⁾ The roads do not comply with current operations, and current quarry operations do not comply with the limitations that the current roads should impose.

How could this project have been allowed to progress to this late stage in the approval process, without this failure coming to light? The EIS and RTS documents submitted to the DPIE made no mention of these issues. The RMS, that is the expert in these matters, is however, not responsible for local roads so has not commented on these matters in their submissions to the DPIE because it has no authority to do so. And lastly, Port Stephens Council (PSC) has apparently overlooked the regulations when they allowed the quarry to seek an increase in tonnage from the EPA in 2011 without public consultation, and has again seemingly overlooked the regulations applicable to the proposed quarry expansion in its submissions to the DPIE.

Applicable Regulations for Council Roads

We note that most of the current quarry haulage truck and dogs are classified as “L2”. The Gross Vehicle Mass (GVM) and length of the combinations put them clearly in that vehicle category.

Brandy Hill Drive (BHD), the primary quarry haulage, has an “Annual Average Daily Traffic” (AADT) in the order of 2000 -3000. This is supported by both data in Hanson’s EIS and from PSC:

- “The TIA’s manual traffic counts were carried out on 13 and 15 September 2014 and show a **1681 vpd for Brandy Hill Drive.**”
- Port Stephens Council for the period **1/12/2016 to 8/12/2016** recorded in Brandy Hill Drive **2166** vehicles ADT.

Clarence Town Road (CTR), the haulage route toward Maitland, takes the majority of traffic from BHD as well as its own traffic to/from Seaham, so its AADT will be higher than BHD.

⁽¹⁾ Performance based Standards Scheme – Network Classification Guidelines

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BHSAG will contend that traffic volumes on both these routes have increased further in the 4+ years since that data was collected.

We understand that the RMS and all other agencies responsible for roads and heavy vehicle transport must comply with the regulations within the following document, which is on the National Heavy Vehicle register (NHVR) website: <https://www.nhvr.gov.au/files/0018-pbsnetwrkclassglines.pdf>

the document is titled:

Performance-Based Standards Scheme
” – Network Classification Guidelines ”

There are a number of sections of this document that show that the current and proposed quarry haulage routes do NOT comply with, for L2 vehicles on roads with AADT in the range 1500 - 3000. Some aspects show significant and substantial non-compliance, which all of the responsible road authorities must ensure are fully complied with, now, and in the future.

Haulage Route Deficiencies:

1. Lane and Shoulder Widths

BHD has a number of sections with barely 3.2m lane widths but with negligible shoulders. These sections have steep embankments on one or both shoulders and are mostly in the cuttings and on causeways over culverts. They are also the most dangerous sections for pedestrians and cyclists, precipitating our insistence on the provision of a pathway (and off road bus-bays).

PBS Scheme - Network Classification Guidelines

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Table 3. Minimum widths for sealed rural roads according to Annual Average Daily Traffic (AADT) data

Road class	(AADT) (vehicles)	Minimum Width (m)	
		Lane ¹	Shoulder ²
L2	< 150	3.4 m seal on 7.2 m formation	
	150 – 500	2.8	1.0
	500 – 1,500	3.1	1.2
	1,500 – 3,000	3.2	1.5
	> 3,000	3.5	1.5
L3	< 150	3.6 m seal on 7.6 m formation	
	150 – 500	2.9	1.2
	500 – 1,500	3.2	1.2
	1,500 – 3,000	3.3	1.5
	> 3,000	3.5	1.3
L4	< 150	4.0 m seal on 8.1 m formation	
	150 – 500	3.0	1.3
	500 – 1,500	3.3	1.5
	1,500 – 3,000	3.6 ³	1.8
	> 3,000	3.9 ⁴	1.8



⁽¹⁾ Performance based Standards Scheme – Network Classification Guidelines

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2. Approved Transport Routes

The Clarencetown-Paterson road route between Joes Cl Woodville and Tocal Rd Bolwarra Heights, is not an approved heavy vehicle traffic route, according to both:

<https://www.rms.nsw.gov.au/business-industry/heavy-vehicles/maps/restricted-access-vehicles-map/map/index.html> and

<https://www.rms.nsw.gov.au/business-industry/heavy-vehicles/maps/performance-based-standards/map/index.html>

Additionally, there is a 50T GVM limit on Clarence Town Road at Woodville, including the Dunmore Bridge, which has not been mentioned by Hanson, in regard to this being one of the two designated haulage routes. There are also other local routes used which are not suitable for L2 vehicles.

The combined tare weight (empty) plus payload of most quarry vehicles will well exceed 50 tonne.

3. Intersections

The intersections at both ends of BHD do not comply with the following standards and guidelines.

BHSAG has previously raised concerns about intersections, particularly over the quarry entrance which has NO entry and turning lanes on Clarence Town Road. The DPIE noted only sight distances as a potential issue, but the absence of entry and exit lanes is of much greater concern. There has been a fatality at this intersection in recent times resulting in a family memorial at the site. This has heightened our concerns over intersection safety in general.

“2.7 Entry length onto main roads and highways

2.7.1 Background

Heavy vehicles should maintain appropriate speeds when they merge into main stream traffic from an entry lane to avoid undue hazard or obstruction.

The length of an entry lane should be sufficient to allow a vehicle, when fully loaded, to accelerate to an acceptable level of the normal traffic speed at the point where the lane joins with the through road.

2.7.2 Requirement

- 1. Table 14 shows the minimum length of an entry lane for different vehicles and conditions. This table refers only to situations where the through road is a main road or a highway with moderate to high traffic volume. In other cases, traffic volumes and traffic composition should be considered when assessing the route if the minimum acceleration lengths required to achieve 70% of the operating speed are not met.*

Table 14. Minimum length of an entry lane onto a main road or highway

Road class	Operating speed on through road (km/h)	Minimum length of entry lane (m)					
		Down grade			Level	Up grade	
		-4%	-2%	-1%	0%	1%	2%
L1	80	150	210	280	400	860	1,840
	110	320	500	720	1,270	1,090	*
L2	80	190	270	350	510	1,090	*
	110	410	630	910	1,620	*	*
L3	80	200	280	370	570	1,500	*
	110	420	670	970	1,870	*	*
L4	80	220	330	460	790	*	*
	110	470	760	1,180	*	*	*

* not possible to accelerate from rest up to the required speed within a distance of 2,000 m.

Our interpretation is that CTR with an 80kph speed and no existing turning lanes, should have minimum entry lanes of 190m.

The BHD/Seaham Rd intersection does currently have extra turning lanes on both approach and departing the quarry, but the approach turning lane on this 90kph road is only about 110m. It should be in the order of 260m.

There is also Australian Standard AS2890.2. Page 17 describes the minimum design standards for major access driveways for HRV and AV vehicles, which the current quarry entrance does not comply with.

Conclusions

1. Hanson must not operate any L2 vehicles on the current BHD or CTR road infrastructure.
2. PSC, as the current quarry consent authority and responsible entity for BHD, must ensure Hanson comply immediately with that restriction.
3. Maitland City Council/PSC/RMS must ensure that any load limit on the Dunmore Bridge and Clarence Town Road/Paterson Road are complied with.
4. The IPC must reject the current project recommendations by the DPIE, due to the inadequacies of the existing road infrastructure, as outlined above. The applicant would need to meet all costs to comply or meet the minimum standards mentioned.

While the quarry expansion will provide financial advantage to Hanson, it must address the disadvantages that its proposal will have on the safety and amenity for the local community and other road users.

We thank you for considering the above.

James Moore President VOWW

Margarete Ritchie Chairperson BHSAG