

Haulage Routes and Transport Code 9.4.13-2 Part B PO7

Please find below further information that I think should be considered re this development Application where I believe it diversifies away from the City Plan (Version 6).

The Council made the following statement and requested additional information as follows:

“24. Haulage route

The applicant has not satisfactorily addressed Performance outcome PO7/ Acceptable outcome AO7 and Performance outcome PO20/ Acceptable outcome AO20 of the Transport code. **The applicant is therefore requested to identify the route that haulage vehicles use to access the Pacific Motorway and the wider road network.** Figure 4.1 of the Rytenskild Traffic Engineering Traffic Impact Assessment shows vehicles turning to and from the south on Maudsland Road, however the nature of these vehicles is unclear.

The applicant is requested to confirm:

- Whether haulage vehicles travel to/from the south from the subject site;
- If haulage vehicles do travel to/from the south, whether they use Council’s road network (e.g. Gaven Arterial Road/Binstead Way) to access the Pacific Motorway; and
- The number of haulage vehicles that use this route on a daily basis”.

The Applicant replied as follows:

“Response:

All heavy vehicles generated by the site use the Tamborine– Oxenford Road route to and from the Pacific Motorway. This is the most efficient route between the site and the Pacific Motorway. Any use of local roads such as the Gaven Arterial Road and Reserve Road would only be for deliveries to projects in the local area that those roads provide access to”.

The applicant has failed to address the required TMR safety analysis for “the route that haulage vehicles use to access the Pacific Motorway” i.e. ” **All heavy vehicles generated by the site use the Tamborine– Oxenford Road route to and from the Pacific Motorway”.**

It also failed to provide the required TMR safety analysis for the 10% of vehicles turning left at the entrance and proceeding along the Maudsland Road (Attachment A) i.e.

- **To and from the east via the Gaven Arterial Road - 5%**
- **To and from the south via the Oxenford – Coomera Gorge Road - 5%**

This is a significant number of heavy vehicles, along a single lane road, past a Child care centre, a number of shops and restaurants and health facilities, bus stops, petrol station, children’s access to the Wake Park and Aqua Park (no footpath available and no bus suitable, therefore have to walk on the single lane Maudsland road). Also, much of this route is part of the ‘On-road bikeways’ Gold Coast Council network (Attachment C).

A safety analysis of vehicles turning left out of the site was quite clearly required.

It also failed to provide the required TMR safety analysis for the 5% of vehicles turning right and then heading west along the Tamborine-Oxenford Road (Attachment A) i.e.

- To and from the west via the Tamborine – Oxenford Road - 5%

This, again, is a significant number of heavy vehicles, along a single lane road, over the vulnerable John Muntz Bridge, passed a Community Pony club, past residential houses, passed aged care facilities, past shops and restaurants, past a petrol station and alongside pedestrian/cyclist pathways (Attachment C).

Again, a safety analysis of vehicles turning left out of the site was quite clearly required.

Also, the Council requested: “• The number of haulage vehicles that use this route on a daily basis”. This was not quantified. However, it is clear that the number of haulage vehicles accessing the site has been increasing year on year (Attachment B) and they have previously said 141 loaded trucks (282 trucks in total) per day for year 2017/2018 and a ‘proposed’ 171 loaded trucks per day (342 trucks in total).

Therefore, the answer should be 282 haulage vehicles per day in the year 2017/2018 increasing to a proposed 342 haulage vehicles per day in the future.

Pedestrian and Cycle Routes

In the Gold Coast travel map (Attachment C) it can be seen that the Gaven Arterial Road is labelled as ‘On-road bikeway’:

<https://www.goldcoast.qld.gov.au/documents/mp/helensvale-runaway-bay-active-travel-map.PDF>

Given that a significant number of all haulage vehicles are using this route (Attachment A) a Safety assessment is clearly required but is not provided as part of the development application.

It can also be seen that there is a Pedestrian/cyclist pathways on ‘part’ of the route on the Tamborine-Oxenford road (heading East over the John Muntz Bridge and West to the Pacific Motorway) from the quarry site. Given that the 90% of all haulage vehicles are using this route (Attachment A) a Safety assessment is clearly required, but is not provided, as part of the development application.

Transport Code 9.4.13-2 PO7

“Development ensures that service vehicle routes to and from the development minimise impacts on residential safety and amenity”.

Acceptable Outcome A07

“Development ensures that service vehicles use the shortest and most direct route to and from the major road network as identified on the Functional road hierarchy network as shown on the Zone map without impacting upon residential amenity and safety of surrounding local area.”

Clearly this development application has not met Transport Code 9.14.13-2 Performance Outcome 7 by failing to provide the required TMR safety analysis for ALL the routes used to major roads.

Also, the development has failed to provide sufficient information to ascertain if Acceptable Outcome 7 is met by not providing the required TMR analysis.

Transport Code 9.4.13-2 PO11

“Development ensures that access for pedestrians and cyclists from the street frontage and from any car parking or set down area to the main entry of the building is designed to provide safe movement. It should be convenient and clearly identifiable and avoid conflict with vehicle movements”.

Acceptable Outcome AO11.4

“Pathways are to be designed and constructed in accordance with *AS 1428.1-2009: Design for access and mobility Part 1: General requirements for access – New building work*”.

There appears to be no pedestrian access and/or cycleway from the main entrance to the office buildings to provide safe movement: “It should be convenient and clearly identifiable and avoid conflict with vehicle movements”.

Also, from Stage 6 onwards there is no clear route to the processing/office area other than apparently through the quarry benching structure (See Attachment D).

This development application does not appear to meet Transport Code 9.4.13-2 Performance Outcome 11 or Acceptable Outcome 11 as there is no defined safe route to the processing/office area from the main entrance and it has not clearly been identifiable as avoiding conflict with vehicles and/or not designed for access and mobility.

This, I would think, would be a clear safety concern given the number of vehicles entering and leaving the facility (via the processing area) and the number of heavy industrial type internal vehicles within the complex. It will also be of particular concern from Stage 6 onwards with the apparent need to access the processing/office area via the top bench of the quarry pit.

Transport Code 9.4.13-2 PO13

“Development ensures that access for pedestrians and cyclists to and from the site is designed to be direct, safe, pleasant and comfortable environments that connect people with places of local interest, services, public transport facilities and neighbourhoods”.

Acceptable Outcome AO13

“Development provides for a disability access compliant shared path or footpath along the frontage of the site within the road reserve, designed and constructed in accordance with the **Functional road hierarchy network** as shown on the Zone map and SC6.11 City Plan policy – Land development guidelines, Section 2 – Transport network standards. ”.

There appears to be no facilities included to meet Transport Code 9.4.13-2 PO13 and/or Acceptable Outcome AO13.

Transport Code 9.4.13-2 PO20

“Development is: (b) designed to reduce impacts on the amenity, safety and operation of the road network through appropriate measures to ensure that the function and capacity of the road network is not compromised”.

The appropriate Traffic Impact Assessment has not been submitted. Therefore, it is impossible to decipher if the road network is to be compromised. This Traffic Impact Assessment is especially important given the increasing number of heavy haulage vehicles envisaged to use these local roads

and the single lane, no cycleway, no pedestrian footpath nature of the local roads that are affected by ALL three of the access routes used by the haulage vehicles entering and exiting the quarry.

Transport Code 9.4.13-2 PO22

“Staged development is planned, designed and constructed to ensure that: (b) adequate car parking is provided for each stage to support the function of the development.”.

Transport Code 9.4.13-2 AO22

“No acceptable outcome provided”.

From Stage 6 onwards there is no car parking identified and/or identifiable (See Attachment D). Therefore this is not an Acceptable Outcome.

Conclusion

The increasing number of Nucrush haulage vehicles (Attachment B), increasing year on year (despite claims to the contrary, Attachment E) using these single lane residential suburban roads around Oxenford and surrounding areas clearly demands a safety analysis be performed and I believe it was negligent to not provide this highly important information and crucial analysis.

This Traffic Impact Assessment is especially important given the increasing number of heavy haulage vehicles envisaged to use these local roads and the single lane, no cycleway, no pedestrian footpath nature of the local roads that are affected by ALL the access routes used by the haulage vehicles to and from the site.

Thank you for considering my objection

5.3 Calculated Pavement Impact

The distribution of heavy vehicle traffic varies depending on market demand. Heavy vehicles only travel between the site and local areas to the south and west if there are projects in those areas which require material to be delivered. Otherwise, heavy vehicles travel to the Pacific Motorway via the Tamborine – Oxenford Road.

The following heavy vehicle trip distribution is considered to be a reasonable estimate of typical travel patterns and has been adopted for this assessment :

- | | |
|--|-----|
| • To and from the Pacific Motorway via the Tamborine – Oxenford Road - | 85% |
| • To and from the west via the Tamborine – Oxenford Road - | 5% |
| • To and from the east via the Gaven Arterial Road - | 5% |
| • To and from the south via the Oxenford – Coomera Gorge Road - | 5% |

The recorded vehicle types discussed in Section 4.1 have been adopted. The recorded generation of 141 loaded trips per day have been factored up to reflect an annual extraction of 1 million tonnes.

Given that the quarry has been in operation for many years, the traffic generation of the quarry has been subtracted from surveyed volumes. This adjusted base traffic volume has been used to determine the required scope of the assessment. That is, the extent to which Standard Axle Repetitions (SARs) generated by the proposal exceed 5% of base SARs.

The analysis indicates that 5% SARs is exceeded for the following road sections :

- Oxenford – Coomera Gorge Road (northbound) only, between the site access and the Tamborine – Oxenford Road intersection.
- Tamborine – Oxenford Road (eastbound only), between the Oxenford – Coomera Gorge Road intersection and the Pacific Motorway interchange.

Attachment B - Proposed 1,000,000 tonnes per annum

141 loaded trucks per day 2017/2018 period, 171 loaded trucks proposed

(282 trucks in total per day 2017/2018 period, 342 trucks proposed)

4.0 DEVELOPMENT TRAFFIC ESTIMATES

Nucrush has provided heavy vehicle traffic generation data for the period between 1 June 2017 and 30 April 2018 (11 months). This data provided as Appendix C indicates the following heavy vehicle composition :

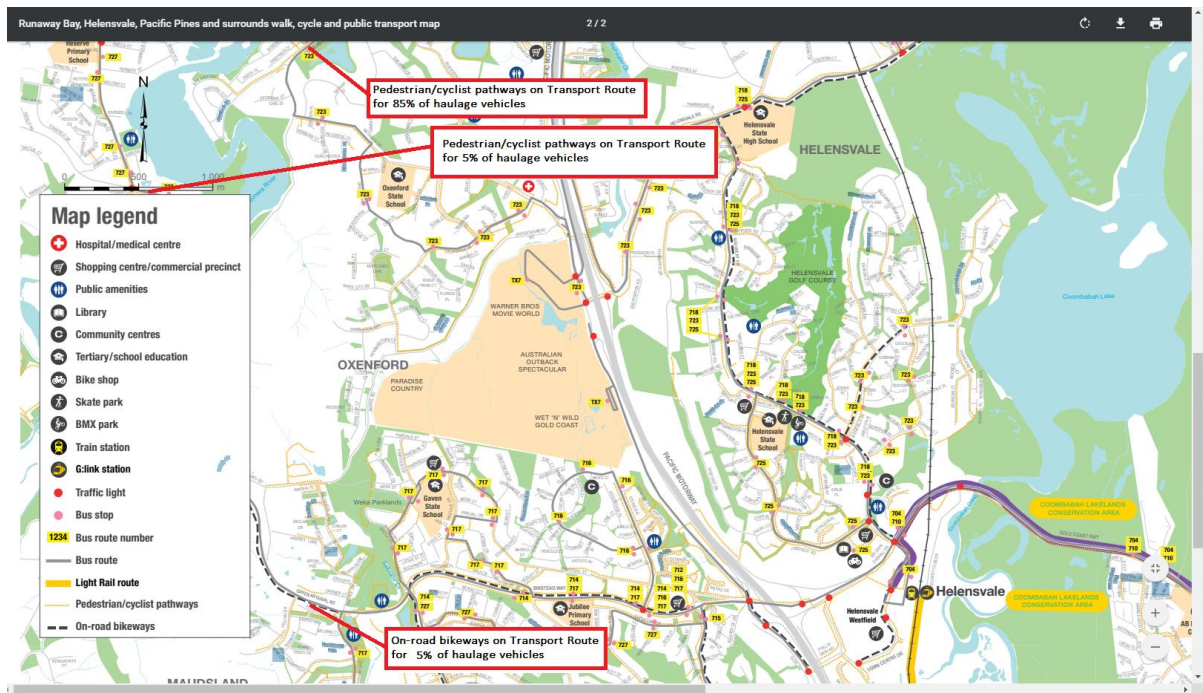
- Heavy rigid - 45%
- Semi trailer - 15%
- Truck and dog trailer - 40%

The average heavy vehicle generation was 141 loaded vehicles per day (281 days per year), which equates to an average annual daily traffic generation of 109 loaded vehicles, for a ten hour day.

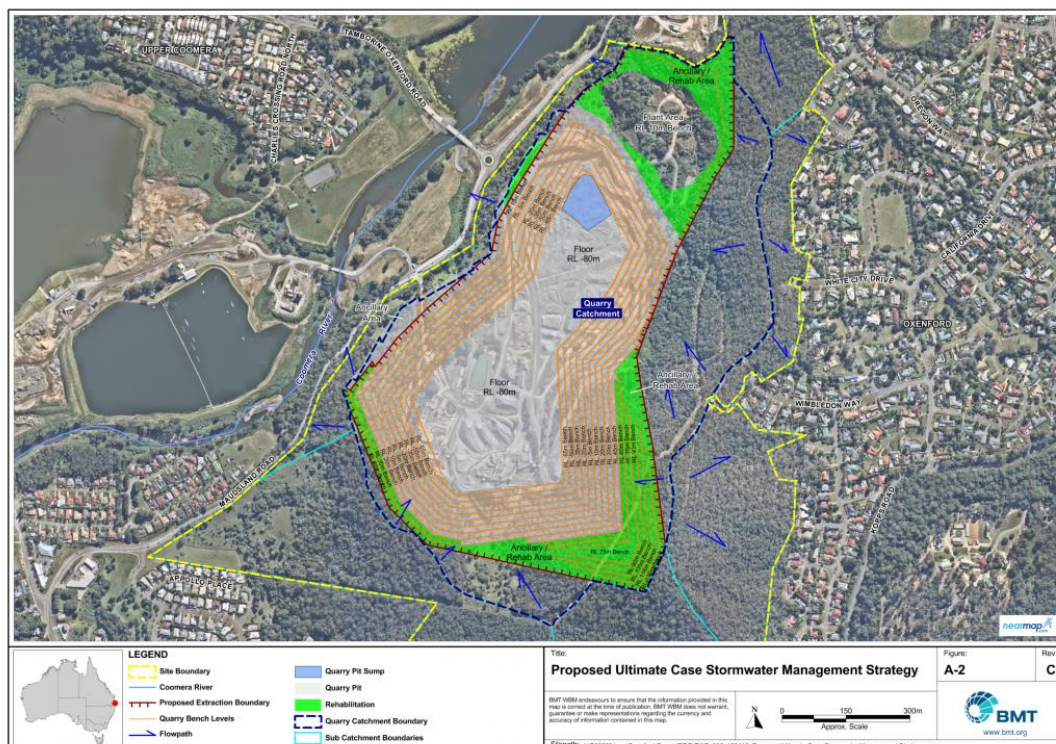
The total amount of material hauled from the site during the 11 month period was approximately 755,000 tonnes, which equates to approximately 825,000 tonnes for a year. Therefore, the heavy vehicle trip generation for the proposed upper extraction rate of one million tonnes per annum would be 171 loaded trucks per day, as follows :

141 loaded trucks x (1,000,000 / 825,000) = 171 loaded trucks per day

Attachment C - Pedestrian/cyclist Pathways and ON-road bikeways



Attachment D - Stage 6 onwards route to processing area



6.0 SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

- The site is located on the eastern side of the Tamborine – Oxenford Road and Maudsland Road. Access is gained via a single point off Maudsland Road located approximately 315 metres south of the Tamborine – Oxenford Road intersection.
- The Average Annual production rates is approximately 600,000 tonnes per annum although the upper production threshold is 1,000,000 tonnes per annum for production and processing. The existing quarry operates between 7am and 6pm Monday – Friday, and between 8am and noon on Saturdays and public holidays (maintenance or cartage only).
- The proposal intends to increase the area of the site that can be used for material extraction which will result in an extension of the life of the quarry, not an increase in current operations. The proposal will simply allow the current level of traffic generation to continue for the foreseeable future.
- Traffic modelling indicates that the existing site access intersection with Maudsland Road will continue to perform satisfactorily under projected future (year 2030) traffic conditions.
- Given that the proposal will not result in any increased traffic demands on the surrounding road network, compared to the existing operation, an assessment of impacts beyond the access intersection is not considered to be warranted.