

Haul Route Report – SIRA concerns

26th March 2003

SIRA has a mission to discover what impact quarrying at Mt. Crosby will have on the local community, and thus has supported the objective to determine whether a suitable haul route option exists for the Kholo Creek Hard Rock Resource.

The Kholo Creek Advisory Panel (KCAP), of which SIRA is a member, approved the Terms of Reference supplied to consultants PPK (now Parson's Brinckerhoff) to undertake a haul route study. However, SIRA has concerns that the resulting report is poor, does not bear close scrutiny, and considers that the findings of this particular study may not be justified.

Specifically, these concerns are:

The study does not meet stated Terms of Reference:

- The consultant was asked to determine an appropriate road alignment with adequate buffers. The report only compares some routes previously suggested by Boral Quarries SEQ, and recommends a preferred option. It has not determined the acceptability and appropriateness thereof.
- The Terms of Reference required individual consultation with property owners within 500 metres of haul route centre lines and allows for this distance to be increased at the discretion of the consultant. The report notes that the consultant in fact only contacted property owners within 250 metres of route centre lines.
- The Terms of Reference require investigation of stability of the river bank in respect to drinking water quality at the weir. Report says this was agreed to be removed but does not advise who authorized this. The report also notes difficulty quantifying the potential for turbidity impact and mentions that this has not been fully addressed. Yet under the Terms of Reference relating to water quality, this is clearly required.
- The Terms of Reference relating to community safety mention recreational water uses, which were also not addressed.
- The consultant was required to provide written confirmation to affected property owners of all discussions and SIRA would expect this to be attached to the report for review. They are not attached and SIRA has received numerous complaints that feedback has not been received in the community. SIRA notes that the community has no way of evaluating whether survey results have been adequately incorporated into the report.

The ratings methodology used in the study is inappropriate:

- In many cases throughout the report, rankings are allocated on a subjective basis and appear arbitrary with no basis given for the values used. These rankings are then often combined, by unidentified mathematical process, to determine a rating, e.g., table pages 34, 36.
- This report only considers issues that were raised in a brief advisory panel consultation process. The panel was not aware at the time of the significance that this would play in the report itself. Other issues that may have been of relevance relating to community impact were not canvassed.
- Consequently, the final ratings matrix used (page 67) is subjective and therefore the combined haul route evaluation (page 70) must lack credibility.

The noise analysis is inaccurate and misleading. Independent evaluation by noise consultant David Moore shows that:

- An incorrect base for noise limits was adopted.
- Inappropriate assumptions of truck noise levels were made and no allowance made for the different type of noise produced by empty trucks.
- Inadequate recognition was given to the deterioration of the ambient acoustic environment.
- Ambient background noise levels adopted by the report do not agree with prior recorded measurements.

Community consultation process:

- Terms of Reference required all property owners within 500m from centre line of haul route options to be individually contacted. This did not happen.
- Report consequently identifies 114 potentially affected property owners of which only 70 were contacted due to poor attempts at establishing communication. SIRA understands that there are in fact 274 freehold property owners with property that lies within 500m of route centre lines.
- Significant residential development borders the 500m zone on Lake Manchester Rd and Blackwall Rd., therefore in keeping with the Terms of Reference it may have been appropriate to increase the consultation zone to 600m. This increases the number of affected property owners to 350.
- Insufficient information was presented to the property owners, with half the property owners contacted (35) reported as not being aware of any supplied information.
- Some matters of concern raised by property owners have not have been addressed within the report, such as manner of compensation and timeliness thereof.

Character and amenity of area:

- Not really directly addressed by the report in terms of visual impact on affected community and repair thereof.
- Existing acoustic amenity of the area not recognized in the report, and variation in wind noise levels is not considered.
- No ratings or consideration given to community perception of the value of area character.

Dust & fumes:

- Air quality based upon Amberley data, not local environment. SIRA wonders how data for a military airbase can be compared to a rural residential bushland area.
- The evaluation of dust and vehicle emissions failed to recognise the effect and importance of local winds and topography, and how this relates to the locations of existing and future residents.
- Despite being raised in the community consultation process, impact of fallout on rainwater tanks and reliance thereon for drinking water has not been addressed.

Vegetation survey and environmental:

- All haul route options pass across endangered remnant ecosystems, which may not be disturbed according to law. This issue is mentioned but not addressed in the report. How is it going to be resolved?
- Field vegetation survey sites are not representative of the study area and do not include endangered remnant ecosystems.

- Ground “truthing” was limited and makes assumptions based upon desktop information (e.g., at sites 3,4 5 & 6) that begs question of the true accuracy thereof. The value of some remnant ecosystems has been incorrectly assessed based upon simple road side observations.
- The report downplays the significance of remnant ecosystems based upon these inaccurate ground observations.

The concept of community severance has not been understood:

- Report mentions severance on Lake Manchester Road for all the northern routes, also Blackwall Rd for route 10. The report does not consider the broad affect on community and property owners to the west of the haul route.

Some engineering assumptions used in the study cannot be substantiated or are used incorrectly:

- Assumption of 714 truck movements per day only accounts for full trucks! The actual number is double this to allow for empty returning trucks.
- Noise basis for haul route also based on incorrect number of trucks per day. No account of difference in noise ascending/descending hills, use of exhaust brakes, etc..
- Base line data for noise from haulage route extrapolated from European highway measurements. SIRA suggests the report should have used noise from an existing Australian haul route.
- Costing estimates based on 440 trucks per day do not correlate with other references in the report – only based on 3 million tpa – how is costing and feasibility affected by volume of 5 million tpa considered elsewhere in the report?
- It incorrectly assumes that the reduction in vehicle speed for grades will be equal for both laden and un-laden vehicles.
- The assumption that the potential for adverse effect within the BCC weir catchments is proportional to the length of road in the catchments area is overly simplistic and not substantiated.
- Erosion potential is a function of the quantity of earthworks moved. For a road such as this, balanced earthworks would be attempted, i.e., all cut would be used as fill. It is hence double counting to relate erosion to quantities of cut plus fill.
- In addition, and certainly in the shorter term, erosion is also a function of the plan area of earthworks, i.e., area disturbed. This has been omitted from the assessment.
- All noise & dust estimates are based upon 60kph speed, yet the reports states a desirable speed limit of 80kph.
- Spillage of hazardous material is not considered (mentioned in Terms of Reference).
- Potential for traffic accident based only on road length. This is clearly a gross simplification and unsound.

Data collected in the study were not used in the report – i.e., do not contribute to report findings:

- Background noise data collected and reported but not used.
- Community feedback from consultation.

Other issues:

- The report does not adequately address use of BCC water reserve land, protection mechanisms currently in place and how these may be overcome.

- Location of single lane bridge at the bottom of steep grades in a water catchments reserve leaves significant potential for an accident or brake failure to materially impact the water quality.
- Current PB report contains changes from previously approved PPK report, not authorized or approved by KCAP for release.
- The report notes that there is no legislation in Queensland regarding control of noise levels on private roads. How is it going to be controlled and what are the appropriate limits?
- Summary of predicted façade noise levels (Attachment A, Appendix C) – there is no mapping or location reference supplied for the 72 receivers listed.

SIRA has supplied the above points to give the community some insight into the concerns that SIRA has with the study and the report. The deficiencies listed above engender a lack of confidence in the report and study findings. SIRA is in the process of formulating a more detailed analysis of the report, which will shortly be made available at the SIRA web site (www.sira.org.au).

However, SIRA cautions that you should make your own conclusions as to the veracity of the report and express your concerns in your own words to ensure that the State Government understands your individual viewpoint.

SIRA also believes that the community has not been given sufficient time to respond and moreover, that timely supply of information to the community has not occurred. In fact, at the time of writing, some sections of the report (Appendix C attachment D, Appendix E Information sheet) are still missing from copies supplied for community consultation!

SIRA therefore does not understand how the community can be expected to properly consider this report and respond in the timeframe supplied. Nevertheless, we have been given an opportunity to provide formal feedback to the State Government, and it behoves all of us to put pen to paper. SIRA encourages you to ask your neighbours to do likewise.

All submissions on the report must be in writing, signed by yourself and addressed to:

Mr. Nev Hore
Department of State Development
P.O. Box 168
BRISBANE ALBERT STREET QLD 4002
Or fax to: (07) 3229 7315

If you are not happy with the haul route report, the study or consultation processes, then please make these concerns known to your local members of parliament and council. Contact addresses may be found overleaf.

The community should note that the minister responsible for this process, i.e, the Minister for State Development, Tom Barton, is not a local resident.

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