

## FOWW SUBMISSION TO JRPP – 25 JULY 2018

### We reiterate our objections:

The Bellingen Shire community re-iterates its belief that this modification should not be approved:

1. The passage of 132 truck & dogs on peak days through Dorrigo, Bellingen and Fernmount has the potential to seriously affect the health, amenity and financial welfare of these townships, and therefore the entire Bellingen Shire.
2. The major concern of our community is the safe transit of vehicles on the roads of the Bellingen Shire and the continued financial prosperity from our main economic driver, tourism.
3. The community is not convinced that the Dorrigo mountain road which is a crucial local access road has the carrying capacity, and nor will it be safe under the onslaught of 132 truck movements.

### Comment on the requirements of the last JRPP Meeting

4. We question the timing of the release of the draft VPA, and the submission period.  

**Firstly**, the documents appear to have been submitted to Clarence Valley Council (CVC) in early June 2017, yet the documents were not released for public comment until 13 December, 2017 - just as the Christmas/New Year holiday season commenced.

**Secondly**, whilst an advertisement was placed in the Bellingen Courier Sun on 20th December 2017 - just three working days before the Christmas/New Year break, the Dorrigo Gazette had already closed for three weeks. So, not only was it unlikely that the Bellingen community be in a position to consider the VPA, it is also probable that the Dorrigo community would be unaware of the submission period.
5. Whilst the draft VPA addresses the issue of weight monitoring, it does not appear to include any provision for **independent** reporting of truck numbers heading along Waterfall Way in an Easterly direction. This must be addressed.
6. The applicant has a previous record of non-compliance and therefore cannot be trusted to self-monitor – the effect of this means that the applicant has carte blanche to operate as it sees fit.
7. The community has NOT been consulted on this issue by the Bellingen Shire Council, and their inadequate response to Clarence Valley Council makes no mention of ANY effect that the approval of this application might have on our community.
8. The EPA response expresses concerns relating to the potential impact of this modification on residents along Waterfall Way, and that it may result in

unacceptable noise impacts on the community. Their concern over a 230% increase is noted.

9. The RMS has classified Waterfall Way as a Class II two lane highway. Class II highways “are generally those that function as access routes to Class I facilities, serve as **scenic** or **recreational** routes (except primary arterials), or pass through rugged terrain. Motorists do not necessarily expect to travel at high speeds. These facilities often serve relatively short trips, the beginning and ending of longer trips, or trips for which **sightseeing** plays a significant role”<sup>1</sup>. We cannot comprehend how peak haulage of 132 truck movements per day could be compatible with scenic, recreation or sightseeing trips.
10. The RMS’s Waterfall Way Draft Corridor Strategy states that the “crash rate of 0.21 casualty crashes/per kilometre/per year which is higher than 0.077 casualty crashes/ per kilometre/per year on other comparable roads of this standard across the State”<sup>2</sup> This is a significant point that cannot be overlooked.

#### **If the DA Modification occurs -We demand conditions to the approval**

However, should this modification be approved, the community asks that the following mandatory requirements be applied:

11. That Bellinghen Shire Council and FOWW be given 7 days advance notice of any "peak haulage periods". That is any excess of trucks over the current 20 per day.
12. That BSC be permitted to veto any "peak haulage period" which coincides with a major tourist event, for example: Camp Creative, Bellinghen Music Festival, and the Christmas/January School Holiday period - when tourist numbers reach a peak not only on weekends but also Monday-Friday. We consider a peak haulage incident is any time the number of trucks exceeds the current 20 per day.
13. We request that the applicant be required, upon written request by BSC or FOWW, to provide truck movement numbers on nominated dates for comparison against local counts.
14. That the applicant be required to submit quarterly truck movement counts to the CVC to enable monitoring of the annual permitted truck movements.
15. That monitoring equipment be installed at the quarry exit point to relay truck movement numbers on a daily basis to CVC and that CVC regularly review the numbers. Quarterly reviews are suggested. This number needs to be relayed to BSC also by CVC.
16. That a Code of Conduct relating to the increased truck movements be imposed on the applicant. (As suggested in the RMS response to CVC on 21/09/16).

We believe that the detrimental impact of this application upon an entire Shire is reason enough for the application to be refused. It is simply too many trucks potentially traversing our Shire and causing damage to our entire economy. How can one business claim for its

expansion to be of state significance when the economy of an entire Shire is at stake?  
REGIONAL areas have enough problems to deal with in generating a viable economy and need protection from forces that would potentially destroy their efforts.

<sup>1</sup> Page 18 – RMS Waterfall Way Draft Corridor Strategy – July 2017

<sup>2</sup> Page 3 – RMS Waterfall Way Draft Corridor Strategy – July 2017