

MCU12/0184 - Traffic Issues

Response to L & R Traffic Report 31 July 2014

Contents

1.0 Introduction

8

2.0 TER limitations, anomalies and omissions

2.1 Limitations 8 2.2 Anomalies and omissions

3.0 Road condition and function 9 3.1 Top Forestry Rd 9 3.2 Haul route roads 9 3.2.1 Crystal St/Maple St roundabout 9 3.2.2 Crystal St 10 3.2.3 Old Ceylon Rd 10 3.2.3 Old Ceylon Rd/Cooroy-Belli Creek Rd intersection 10 3.2.4 Cooroy-Belli Creek Rd

4.0 Proposed mitigation works – Top Forestry Rd 10 4.1 Section 1 10 4.2 Section 2 10 4.3 Section 3

5.0 Impacts

5.1 Road condition and function 11 5.1.1 Traffic volumes – Top Forestry Rd 11 5.1.2 Road works and maintenance costs – Top Forestry Rd 11 5.1.3 Interactions with haul route road users 11 5.2 Residents' amenity! 11 5.2.1 Health risks 12 5.2.2 Loss of amenity costs

6.0 Conclusions

1.0 Introduction
The L&R Traffic Engineering Report (31.07.2014) concludes that the low vehicle intensity of the poultry operations would have limited impacts on the local road network given its present volumes and high standard of construction and surface condition, with only minor works required on Top Forestry Rd.

This conclusion is questionable because of the report's omissions, anomalies and limitations.

Given the actual road conditions and usage, the haul route roads are unsuitable for the regular heavy vehicle traffic the poultry operation would generate. The volume, types and schedules of these vehicles would have significant negative impacts on:

- road condition and function

- road safety
- residents' amenity
- property values.

2.0 TER limitations, anomalies and omissions

2.1 Limitations – the report does not take into consideration:

a) The 7 days survey data is not representative of traffic volumes and road users on Top Forestry Rd.

b) The 80kph speed limit on Top Forestry Rd, Old Ceylon Rd and the Cooroy-Belli Creek Rd from No.129.

c) The vehicle accident history of the haul route roads from Top Forestry Rd to the Bruce Hwy .

d) Present road condition and usage of the haul route. e) The route for the shed waste removal trucks.

f) The Qld DTMR recommended 8 metres minimum unsealed road width for Multi-Combination Vehicle use.

g) The Qld DTMR operational restriction on MCVs from obstructing the path of other vehicles.

h) Heavy vehicles cause more noise, dust, odour and road damage than other vehicle types.

i) Impacts on residents living beside the entire haul route.

2.2 Anomalies and omissions

a) The survey cameras were in place March 7-21, but only data from March 12-18 was used.

b) The survey data does not distinguish between light and heavy truck use on Top Forestry Rd.

c) People walking along Top Forestry Rd were not surveyed; only those crossing it and King Parrot Lane.

d) The report does not consider the usual volume reductions during public and school holidays.

e) The report omits vehicle numbers for: • the poultry operation's permanent and casual staff. • Week 5 loss collection. • Water deliveries – the operation's water needs will exceed stored supply during extended dry periods.

f) Contradictory totals are given for vehicle volumes. For example:

Batch cycle total vehicles Batch cycle total heavy vehicles Bird pick-up total heavy vehicles

App C 244

App C totals 226

App C totals column 108 trips/54 trucks

Fig. 4.2 254

MVC + AV + Rigid truck totals 210

App C AV column 94 trips/47 trucks

g) Loading duration for a bird pick-up truck is given as 60 minutes (p 12) and 40 minutes (App C).

3.0 Road condition and function

3.1 Top Forestry Rd

Top Forestry Rd is an 80kph, narrow unsealed road with unformed shoulders and poor sightlines. It normally is graded once a year, and deteriorates quickly after heavy rain. The only regular heavy vehicles are the Council rubbish trucks.

Its primary function is residential property access. Of the 31 properties accessed via Top Forestry Rd, 27 are residential and have no alternative access. The only commercially productive agricultural property is the applicant's avocado farm.

The road provides access to West Cooroy State Forest which has not been logged in more than 5 years and is now managed by Queensland Parks & Wildlife Service. Council promotes the area as a bird-watching location (No 9 on Noosa Bird Trail Map) and a mountain biking destination. Other recreational users include hikers and horse riders.

The report considers the road surface to be of a high standard with no potholing or rutting. Before the April inspection, the road was graded twice in 2013 followed by a brief wet season with local rainfall for Jan through Mar being 60% less than 2012. The road was graded in July 2014 with no significant rainfall between the first and second inspections. The report does not consider the degradation effects of heavy vehicle volumes, speed, weight and articulation on the road surface compared to its current light vehicle usage.

The report claims intermittent road widening occurred

during the July grading. While roadside grass was scraped from the edges, there was no structural widening.

3.2 Haul Route Roads Structural aspects of the haul route roads limit their suitability for the operation's heavy vehicle traffic.

3.2.1 The Crystal St/Maple St roundabout and adjacent centre islands are not designed for heavy vehicle encroachment; neither is the centre island outside the Noosa Christian College. Pedestrians, including students, use these structures when crossing Maple St and to access nearby bus stops.

3.2.2 Crystal St limitations include a blind curve, many vehicles parked kerbside and a busy intersection at Myall St opposite the Cooroy Golf Course.

3.2.3 Old Ceylon Rd has a 6.2m sealed road width and insufficient vertical clearance between the unsealed shoulders and overhead trees. State road guidelines recommend a 3.5m lane width for MCV use of two lane sealed roads.

The Old Ceylon Rd/Cooroy-Belli Creek Rd intersection has a degraded surface, poor sightlines and a Give Way sign. Given the 80kph speed limit on the Belli Creek Rd and the sweep path of a heavy vehicle, trucks turning left into and right out of Old Ceylon Rd increase the potential for accidents and the obstruction of other vehicles.

3.2.4 The Cooroy-Belli Creek Rd beyond No. 129 is part of an established cyclist training and event route with a minimum sealed road width, narrow shoulders, poor sightlines, unmarked concealed entrances and an 80kph speed limit. The interaction of heavy trucks with cyclists raises road safety concerns given the 2014 bicyclist road rules, which require a 1.5m clearance when overtaking

cyclists on 60+kph roads, while permitting drivers to cross unbroken centre lines, and cyclists to ride two abreast.

4.0 Proposed mitigation works – Top Forestry Rd

The proposed minor mitigation works are inadequate and inappropriate. They do not effectively address Top Forestry Rd's limitations to carry increased volumes of heavy vehicle traffic. The works would increase road maintenance frequency and costs. The proposed works, signage and vegetation removal would compromise the road's visual amenity. Vegetation clearance also would destabilise road edges and increase the dust spread range.

The works are based on an ARRB suggested minimum carriageway width of 5.5m. The Qld DTMR classifies a 19m/50T B-Double as a Multi-Combination Vehicle. MCV route guidelines recommend a minimum 8m width for unsealed roads (p14). The standard width of a prime mover is 2.9m (2.5m cab + 200mm each side for wing mirrors). The combined width of two on-coming B-Doubles/AVs would be 5.8m with no clearance between vehicles. A minimum 5.5m road width does not address the safety risks associated with the passage of on-coming heavy trucks, especially as the road shoulders are unstable or non-existent. Nor does it mitigate the risks for other drivers.

4.1 Section 1 No mitigation works are proposed, however the narrowest part just before King Parrot Lane is edged by large trees and a steep bank that has subsided twice in the last 4 years.

4.2 Section 2 Widening parts of Section 2 would require the removal of large, mature native trees on both sides of the road and the stabilisation of road edges and a subsiding bank. L&R states that the 670m-long Section 2 has road widths of 5.0m – 5.4m, but recommends that only a 350m length be widened to 5.5m.

4.3 Section 3 The installation of a 4.5m wide, 236m-long, one-way system in Section 3 for the benefit of the poultry operation would inconvenience other road users and impede normal traffic flow. This system raises safety concerns given the road's long-term, customary 2 lane use.

The alternative road widening proposal at chainage 1100m "involves significant slope and embankment stability work" (Appendix D). Both proposals impose road works and maintenance costs on ratepayers.

No mitigation works are proposed for the junction of the site access road and Top Forestry Rd. Trucks are required to drive forward when entering and exiting the access road, however drivers would be unable to see approaching outbound vehicles.

The collection of the carcass bins would compromise road safety and obstruct traffic if, as stated previously, the collection trucks will not be entering the site. The location of the carcass bins relative to the school bus stop is also of concern.

5.0 Impacts

5.1 Road condition and function

5.1.1 Traffic volumes – Top Forestry Rd

The operation's forecasted vehicle numbers would generate the following % volume increases: 29.5% minimum daily traffic 21.5% maximum daily traffic

8.3% maximum weekly traffic 15% maximum weekly truck traffic.

The survey recorded zero truck movements from 0:00am – 6:00am. A projected 9 heavy truck trips for this period would occur during bird pick-ups.

It is disingenuous to say that a 25% peak volume increase due to seasonal agricultural variations is not unusual for unsealed rural roads (MWA p27), when the only seasonal variation on Top Forestry Rd is related to the applicant's avocado production which is accounted for already.

5.1.2 Road works and maintenance costs – Top Forestry Rd

The poultry operation would increase the frequency and costs of road maintenance, while the structural mitigation works would impose additional costs on ratepayers.

5.1.3 Interactions with haul route road users

Introducing heavy vehicle traffic to the haul route roads would increase road safety risks for motorists, pedestrians and cyclists.

The interaction of heavy trucks with school buses and rubbish trucks that stop and start frequently poses considerable safety risks. There are many sections on the route where rubbish trucks and buses cannot pull off the road when stopping, and overtaking is not possible.

During a live bird pick-up, there would be significant interaction with the 7-9am school and commuter traffic (buses and cars) and pedestrians on the haul route, especially at the Maple St/Crystal St roundabout and on Myall St. On alternate Monday mornings there also are 2 rubbish collections.

5.2 Residents' Amenity

MWA (p 27) claims that a peak volume of 26 vehicles per day represents a minor unreasonable nuisance potential on Top Forestry Rd without considering that 24 of those 26 vehicles are heavy trucks. An ambient road dust assessment was not undertaken.

The operation's vehicle volumes, types, loads and schedules would have significant negative amenity impacts on residents adjacent to the entire haul route. The use of average volumes and the claim there is no operational traffic on 30/63 days/cycle does not mitigate the negative impacts of night traffic and maximum vehicle days, especially as the calendar days of these events change each batch cycle. Also, the report does not take into account that: • road surface and a heavy vehicle's weight and speed determine the amount and range of noise, dust and vibration. • the nature of the noises and odours generated by the operation's vehicle types and loads are more intrusive than other sources. • the bird pick-up time span would exceed 10 hours if more than 10 trucks are required.

5.2.1 Health risks – dust, noise odour and vibration

Health risks arising from the operation's heavy vehicle traffic include: • respiratory illnesses associated with airborne contaminants from road dust, vehicle fumes and load contents (i.e. carcasses and manure). • contamination of domestic water supplies as there is no reticulated water supply to Top Forestry Rd. • sleep deprivation during bird pick-ups with up to 3 truck trips/hour starting at 02:30am.

5.2.2 Loss of amenity costs

The physical, psychological and financial well-being of residents along the haul route would be compromised for the applicant's financial gain. Increased costs imposed on residents by the operation's vehicle traffic include: • health care

- property and water supply maintenance.

Residents also would face the negative financial implications of decreased property values and saleability.

6.0 Conclusions

None of the applicant's Traffic Engineering Reports have considered the entire haul route, including its:

- structural limitations
- customary use by pedestrians, cyclists and tourists.

The poultry operation's vehicle traffic would impose unacceptable risks and costs on haul route road users and residents. Significant negative impacts include:

- increased road safety risks.
- increased road works and maintenance costs.
- residents' loss of amenity.

The conclusions and recommendations of the L&R Traffic Engineering Report are questionable. Its omissions, anomalies and limitations indicate the operation's vehicle traffic and its impacts have been underestimated. Further, should the poultry operations require vehicles larger than the designated 19m/50 tonnes B-double, then Council would have to consider the need for a route assessment and approval.