

To: The Assessment Manager,
Douglas Shire Council
64-66 Front Street,
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Via email: enquiries@douglas.qld.gov.au

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16 December 2024

Dear Sir/Madam,

Subject: Objection to Development Application for Material Change of Use (Extractive Industry) - Lot 1 on RP893855, Bonnie Doon Road, Killaloe

Council Application Number MCUI 2024_5682/1

I am writing to formally object to the proposed sand extraction activity at Lot 1 on RP893855, Bonnie Doon Road, Killaloe, on the grounds of non-compliance with the Transport Network Overlay Code outlined in the Douglas Shire Planning Scheme 2018 Version 1.0. The contradictions and inadequacies in the RPS report regarding transport infrastructure and safety standards warrant further scrutiny.

Key Contradictions with the Transport Network Overlay Code

1. Performance Outcome PO1 – Compatibility with Road Hierarchy

- The Transport Network Overlay Code (8.2.10.3) requires developments to align with the road hierarchy, ensuring compatibility with the intended role and function of transport networks. The RPS report identifies Bonnie Doon Road as a collector road but fails to demonstrate how the proposed daily haulage of 20-tonne trucks, 5 trips per day which equates to 10 truck movements daily (5 trucks into site, 5 trucks out of site) will maintain the safety and efficiency of this collector road. Furthermore, if the quarry operations increase to the 100,000 tonne limit applied for in their EA annually that would be around 16 trips per day. This would be 32 truck movements daily (16 trucks in to site, 16 trucks out of site), or 192 truck movements weekly (32 daily truck movements x 6 days per week)

2. Performance Outcome PO2 – Timely Infrastructure Provision

- The RPS report does not adequately address the need for infrastructure improvements to accommodate increased heavy vehicle traffic. Acceptable Outcome AO2 requires development to provide necessary infrastructure improvements, yet the report fails to specify upgrades to Bonnie Doon Road or the unnamed access road to ensure they are suitable for heavy vehicle operations.

3. Performance Outcome PO4 – Safety and Efficiency of Major Transport Corridors

- The RPS report does not include a comprehensive Traffic Impact Assessment, which is essential to demonstrate compliance with PO4 and ensure the proposed access layout adheres to safety and efficiency standards.

4. Performance Outcome PO5 – Retention of Vegetation for Screening

- PO5 mandates retaining and enhancing vegetation to mitigate dust and noise impacts from transport operations. The proposal's haul route across a farm drain and unnamed road lacks adequate measures to protect the surrounding rural and residential environment from dust, noise, and visual intrusion caused by haulage activities.

Additional Concerns

- The lack of a detailed Traffic Impact Assessment contravenes the requirements outlined in the Douglas Shire Planning Scheme Policy SC6.10 (Parking and Access). This omission raises concerns about road wear, increased maintenance costs, and public safety risks due to heavy vehicle operations on roads not designed for such use.
- The proposal's reliance on temporary solutions for road infrastructure improvements without permanent upgrades undermines the long-term safety and efficiency of the local transport network.
- The proposed bridge over the moderate waterway will have a damming effect on Bonnie Doon Road, isolating the rest of the community during flood events.
- Who will pay for the upkeep of Bonnie Doon Road and the un-named road as both are under the Douglas Shire's control?
- The un-named road onto Bonnie Doon Road is dangerous as there is no turn off lane because of the box culverts and drains either side of Bonnie Doon Road.
- Following all extraction we will be left with a big hole in the ground. The freshwater will flood to the ocean and kill the mangroves.
- There is fish and other species including saltwater crocodiles in the flowing tidal drain between the Nagan property and Lot 1. It is not a stagnant drain with only Singapore daisies as it's best attribute. Because it is tidal there are 4 movements a day.
- Air brakes on a 20 ton truck moving along Bonnie Doon Road daily – six days a week will mean we have to put up with excessive noise from the braking system.

Request for Action

Given these discrepancies, I urge the Council to:

1. Reject the development application.

Thank you for considering this submission. I trust that the Council will carefully evaluate the concerns raised and ensure that development in the region adheres to the Douglas Shire Planning Scheme and prioritizes community safety and well-being.

Yours
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[Redacted Signature]

