

SUBMISSION – GERROA QUARRY MODIFICATION (MP05 0099-Mod-2).

Summary.

The MOD2 application should be rejected on the basis that:

- The need to increase the limit on approval to “not transport more than 80,000 tonnes of product from the site in a year” has not been established
- The application is not in the public interest
- No benefit would accrue to the community in increasing the limit on approval
- Whilst the application may result in an improved return on investment to the applicant, it would result in significant and unacceptable impacts that would be borne by the community.

This submission will deal with the following issues:

1. Description of the Proposal
2. Need and Public Interest
3. Unacceptable Impacts on the Community

1. Description of the Proposal. (Ref: S3. Pp25- 27).

The Proposed Modification would increase the maximum transportation rate by 50% from 80,000tpa to 120,000tpa. (Ref. Modification Report P25).

To transport the increased sand will require either:

- a greater number of truck movements using the same sized trucks, or,
- the same number of movements using larger trucks (32 tonnes to 42 tonnes), or,
- a mixture of both.

Given actual extraction rates have averaged 52,000 tonnes per annum, (see Appendix 1), an increase to 120,000 tonnes per annum would actually represent a 2.3 times increase in the real impacts of truck movements experienced by the community.

2. Need and Public Interest. (Ref: S7.1-11. Pp67 – 75. S7.4; S7.5; S7.9; S7.10).

The Proposed Modification does not serve the public interest and is not justified.

A. There is no demonstrated improved local economic benefit as:

- there is no indication that jobs will be lost or created
- the required amount of sand for the local LGA's will continue to be provided at a market price by current suppliers in the local market as has been done for the last 50 + years.
- competition and price setting have and are determined by an already adequately supplied market.

B. The Proposed Modification is not consistent with community feedback or views as none have been expressed through the CCC (Ref S7.5). According to the Minutes:

- no documentation or material has been presented to the CCC or community prior to that available during public exhibition.
- the only agenda item was to advise of the upcoming modification application which would be placed on exhibition for comment.

C. The need for the significant increase in production for the existing local/regional market has not been demonstrated.

- the application for the increase in the limit of production coincides with both the acquisition of the operation by the vertically integrated Regional Quarries, and a sudden increase in production reported for the 25FY (as provided in Appendix 1).
- therefore, it could be assumed that the application could result in a greater return on investment if able to access a wider and more distant but cost-effective market. However, an accelerated depletion of the resource would serve to divert a future supply from the local/regional market.

- D. The road despatch system is not suitable to safely cater for the proposed increase in traffic movements and/or a significant increase in truck size that is proposed.

3. Unacceptable Impacts on the Community

In simple terms, to increase the limit to 120,000 tonnes has to result in a 50% increase in truck frequency, or, the trucks would have to drastically increase in size, or both. Each of these would have unacceptable impacts on the community.

It is important to note that there has been no traffic assessment in the application of the impacts on the capacity, condition, safety and efficiency of the local and town roads along the transport routes that would result from the proposed increase in frequency and/or truck size.

Impacts of the proposal on the community are outlined under the following;

- A. Increased truck frequency
- B. Increased truck size
- C. Combined impacts on the community

A. Impacts of an increase in truck frequency.

S3.2 Overview and S3.4 Transportation (Ref Pp.25-27), contain conflicting information regarding the transportation route and vehicle distribution to/from the north or south.

Based on the different information this could result in;

a) Based on the transportation route presented in the Modification Report (Ref P27), and in accordance with the Conditions of Consent, the Proposed Modification would result in a truck **movement every 24 minutes through Gerringong and Gerroa to the north**, plus a truck **movement every hour through Berry township to the south** (see i. below).

b) Alternatively, based on the transportation route stipulated by management procedures (Ref: QEMP. 27/6/23; Pp6-18; P6-19), and Fig 3 (Mod Report P12), the vast majority of truck movements north and south are directed through Gerringong and Gerroa as the approved route. Consequently, the Proposed Modification would result in a **truck movement in the order of every 17 minutes through Gerringong and Gerroa to the north**. (see ii. below)

Compared to the average annual transportation movement over the last fifteen years, this would represent **a tripling in frequency to the north** (if b. above), and close **to a doubling of frequency of any movement to the south** (if a. above). See the calculation for 52K t/pa (15-year average) below.

The frequency would present a dominant and intrusive presence and would increase safety, maintenance and noise concerns within the coastal villages and associated roads.

The following four scenarios (i.– iv.) illustrates the increase in truck frequency that would result from the Proposed Modification under various potential transportation operations.

i) Using allowed operating hours at 6 days per week, (Mon -Sat), and 48 weeks of work per year, with ~70% travelling north through Gerringong and Gerroa, and ~30% travelling south through Berry township in accordance and compliance with the route approved in Conditions of Consent (Ref: Mod. Report P27), the following comparisons are valid **using 22t average truckloads** for consistency with the Mod. Report (Ref: P27):

52K t/pa (15-year average), results in:

(9 trucks/18 movements per day/6days/48weeks)

12 movements **north** per day or every **55 minutes**.

and 6 movements per day in the **south** or every **1hr 50mins**.

80K t/pa (current limit), results in:

(12 trucks/24 movements per day/6 days/48 weeks)

17 movements **north** per day or every **40 minutes**.

and 7 movements per day in the **south** or every **90 mins**.

At **120K t/pa** (Mod2 application), you would need:

19 trucks/38 movements per day/6 days/48 weeks

with 27 movements **north** per day or every **24 minutes**.

and 11 movements per day in the **south** or every **hour**.

ii) Alternatively, at 120K t/pa (Mod2 application) and all movements directed north/6 days/48 weeks/22 t average truckload would result in:
38 movements **north** per day or **every 17 minutes**.

iii) Using operating hours based on a **9-day fortnight**, 48 weeks per year, **22t average truckloads**, and all traffic travelling north through Gerringong and Gerroa:

At **120k t/pa**, you would need:

50 movements **north** per day or **every 13 minutes**.

iv) Using operating hours based on a **9-day fortnight**, 48 weeks per year, **35t average truckloads**, and all traffic travelling north through Gerringong and Gerroa:

At **120K t/pa**, you would need:

32 movements **north** per day or **every 20 minutes**.

B. Impacts of an increase in truck size.

The Proposed Modification would result in the use of “a greater proportion of larger capacity vehicles” that are more than double the previously modelled average vehicle in size and capacity.

They are unsuited to the transportation route encompassing residential and village centres, would increase the safety risk to the community and would significantly degrade the road structure.

- previous modelling (Cardno 2018) assumed an average truck load of only 15 tonnes operating at maximum traffic levels was required to transport 80, 000 t of product per annum.
- prior to the sudden increase in production reported for the 25FY, and a corresponding increase in the use of larger vehicles up to 42 t, the 22t truck was in general the largest vehicle observed in transportation.
- this application would result in the routine use of larger trucks (32t to 42t).
- a 42 t truck and dog vehicle is twice the size and length (~20m), compared to a 25 t vehicle.
- a 42 t truck will cause significantly more damage compared to lighter capacity trucks as evidenced by recent road damage along the northern route.

C. Combined impacts on the Community

There are unacceptable impacts of an increase in truck frequency and/or size on the community, including;

- exponential damage to road pavements and structure in excess of contributions and maintenance schedules leading to permanently damaged roads. Roads in proximity to the quarry are generally in poor condition and in decline.
- additional pressure on road capacity and safety in the context of recent increases in density and population, increasing visiting numbers and conversion of rural to residential land along the transportation route.
- increased frequency and level of truck noise at sensitive locations (vertical climbs and Mayflower Retirement Village)
- a series of unsafe roundabouts, both north and south, too small for large trucks to routinely negotiate with safety amongst traffic, bicycle riders and pedestrians.
- pedestrian islands and parked cars resulting in trucks having to veer into oncoming lanes of traffic. (e.g. at the Fern St Post Office)
- domination of narrow town and country roads by a convoy of trucks that travel in series.
- The frequency and size of the trucks would act to adversely impact the image and identity of the highly visited and attractive tourist towns
- heightened danger at intersections with limited sight distance (e.g. exit from Gerroa via Riverleigh Ave; intersection of Toolijooa Rd and Berry Beach Rd).
- heightened risk from having to navigate narrow road passages and parked vehicles in built up areas
- heightened risk posed by bends with limited visibility that have contributed to head-on collisions and a fatality

Appendix 1: Extraction Volumes

Over the last 15 years, the extraction volume per annum has averaged 52,000 tonnes, and as low as 31,000 tonnes for the 21 – 22 year.

- some manufactured sand and additional sand from the Southern Highlands have in the past been used to blend with the fine local sand to achieve specifications.
- annual extraction/sales volumes reported in Annual Reviews and Audits show:

AR(Aug25) for FY25:	79,968.21 t
AR(Aug24) for 22 - 23:	45,986 t
AR(Aug23) for 21 - 22:	31,291 t
AR(July22) for 20 - 21:	43,155 t
AR(July21) for 19 - 20:	54,178 t
Env. Audit (20/10/19) for 18 - 19;	55,790 t
AR(July19) for 17 - 18;	49,128 t
AR(July18) for 16 - 17:	80,005 t
AR(July17) for 15 - 16:	79,832 t
AR(July16) for 14 - 15:	79,646 t
AR for 13 - 14:	74,153 t
AR for 12 - 13:	31,996 t
AR for 11 - 12:	26,911 t
Env. Audit (Jan 14) for 10 - 11:	53,591 t

Note that the AR(Aug25) shows sand sales volumes for the Financial Year 25, and the previous AR(Aug24) shows sales for the 22 - 23 period, which means that the July23 - June24 period is missing.