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3 April 2025

Contact: George Angelis

Carl Dumpleton
Department of Planning, Housing and Infrastructure
PO Box 39
SYDNEY NSW 2001

Dear Carl

**Subject: Modification 2 Gunlake Quarry Continuation Project – Mod 2 Trucks
(SSD-12469087-Mod 2)**

Thank you for Inviting Council to comment on the above modification.

The following comments are provided regarding the subject proposal which seeks to -

- increase the maximum number of inbound and outbound truck movements on the main transport route (Brayton Road / Ambrose Road / Red Hills Road) from the present 375 each way per working day to 475 each way
- maintain the maximum outbound movement of no more than 38 trips per working day on the Secondary Transport Route (Brayton Road to George Street, Marulan) but delete the current requirement for these movements to average no more than 25 movements.
- Maintain the current annual transport limit of 4.2 Mtpa.
- Maintain the current road maintenance contribution

The applicant's Traffic Impact Assessment report concludes that the increase in truck movements will not alter the LoS of the transport routes.

Council has previously considered a report at its meeting of 19/07/2022 regarding the *Gunlake Quarry Continuation Project Submission Report*. That report was in regard to the applicant seeking to increase the annual extraction from 2.6 Mtpa to 4.2 Mtpa (the current approved rate) and a coinciding increase in truck movements from 295 each way per day to the current 375. The Council report summary advised that:

Council is supportive of Gunlake and acknowledge the positive impact the operation has within the community through the creation of employment opportunities and the sponsorship of community events and infrastructure. However, the proposal at hand is a significant expansion and represents a substantial deviation from the current approval. As such, Council has the responsibility to ensure an appropriate balance is achieved between promoting growth and ensuring any community impact is appropriately managed.

The report's recommendations were adopted by Council. (Refer copy of Minute 2022/238 attached).

The proposal was approved by Minister for Planning on 2 March 2023, however not all Council recommendations were adopted. Discussion on these follows.

Condition A9 of the consent provides for the import of 50,000 tpa of concrete waste and I query whether a contribution is being received for this transport.

Condition A17 provides for payment of road maintenance contributions –

CONTRIBUTIONS TO COUNCIL

A17. The Applicant must pay annual financial contributions to Council towards the maintenance of roads used for haulage of quarry products along the Primary and Secondary Transport Routes. The contributions must be determined in accordance with the Goulburn Mulwaree Local Infrastructure Contributions Plan 2021 (including any updated or revised version of this plan), or as otherwise agreed by Council. Contributions must be paid to Council within one month of commencement of development under this consent, and within one month of the anniversary of the date of this consent each year, or as otherwise agreed by Council, and reported in the Annual Review.

The report to Council discussed this aspect and is also appended. The contents of the report are just as relevant to the current proposal.

Conditions B44 & B45 relate to haulage route road upgrades

Primary Transport Route

B44. Prior to transporting more than 2.6 million tonnes per calendar year of quarry products from the site, the Applicant must complete and implement:

- a) Culvert widening of Culverts A-E along the Primary Transport Route as described in Road Safety Assessment Report (Section 4.1.1) prepared by Australian Road Research Board (dated 15 September 2021);*
- b) Road safety measures on the Primary Transport Route: as described in the Primary Transport Route - Road Safety Audit Report (Table 3.1) prepared by Australian Road Research Board (dated 14 September 2021), including but not limited:*
 - i. delineation measures (guideposts, line marking, signage and supplementary markers);*
 - ii. trimming/removing vegetation to ensure adequate lines of sight;*
 - iii. to the provision of a minimum 3 m clear zone, or installation of safety barriers where this cannot be achieved; and*
 - iv. Hume Highway and Red Hills Road intersection repair works:*
 - v. repair the existing damage to the intersection road shoulder and infrastructure; and (ii) implement measures to stop/prevent vehicles cutting the corner when exiting the Hume Highway and entering Red Hills Road.*

Note: The location of Culverts A-E is shown in Appendix 3.

B45. The Applicant must complete all works on the Primary Transport Route in accordance with the latest Austroads standards, in consultation with and to the satisfaction of Council.

It is noted that Council requested improvements to Culvert F on Ambrose Road but the applicant objected to this based on its Benefit/Cost ratio being excessive.

Conditions B49 & B50 relate to a Transport Options Review

Transport Options Review

B49. Within 5 years of the date of this consent, and every 10 years thereafter, the Applicant must commission, commence and pay the full cost of a Transport Options Review for the development. This review must:

- a) be conducted by a suitably qualified, experienced and independent expert/s whose appointment has been endorsed by the Planning Secretary;*
- b) include detailed consultation with TfNSW and Council;*
- c) review the economic, social and environmental costs and benefits of all reasonable and feasible options for the transport of quarry products from the site (including by rail and including truck movements currently permitted by this consent);*
- d) recommend any appropriate mitigation measures or actions to reduce the economic, social and environmental costs associated with transport of quarry products from the site, and*
- e) be conducted and reported to the satisfaction of the Planning Secretary.*

B50. Within 12 weeks of commencing this review or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the review report to the Planning Secretary, TfNSW and Council and any other person that requests it, together with its response to any recommendations contained in the review report.

The development is 2 years into its operational consent. The proposed increase in daily haulage would increase truck movements per day up to 26% over the current approval, but this will also be an increase of 61% over the pre-2022 volumes. Clearly this is a substantial increase in traffic movements, which has potential to cause traffic conflict with other road users.

Council conducted traffic volume/speed counts in Ambrose Road 700m east of Brayton Road early this year. The counts identified 30% of traffic as light vehicles with the remainder being heavy vehicles, with 53% being B-doubles and MADs (Medium articulated). The counts were for all road users, not just traffic associated with Gunlake Quarry. The average daily heavy vehicle traffic equated to 220 vpd each way, meaning that the quarry was not transporting at its peak allowable rate during the traffic count period.

Ambrose Road is signposted with an 80kph speed limit. The speed counts indicated that 43.2% of vehicles (including trucks) were travelling in the 80-90 kph speed range and 26.4% of vehicles were travelling in the 90-100 kph speed range. This is problematic to a road such as Ambrose Road which has a relatively straight horizontal alignment with a rolling vertical alignment. Vehicles, particularly laden trucks, will tend to gain momentum on downhills to assist with climbing the uphill sections. This aspect should be discussed further with the quarry management.

It is noted that the current annual transport limit of 4.2 Mtpa will not change. An inspection of the haul routes indicated there were several stretches of road pavement subject to defects. It is recognised that the current road maintenance contribution is not keeping pace with the deterioration rate.

There is potential for the haul route to be utilised by other developments in the immediate future, these being –

- At present there is an EIS that has been lodged for a solar farm & BESS in Upper Lachlan Shire (SSD 63344210 - Wattle Creek Solar Farm Project) and (SSD-63345458 — Wattle Creek Battery Energy Storage System) that would gain construction access at 1001 Canyonleigh Road
- On 25/03/25 Council received a request for information regarding preparation of a Traffic Impact Assessment for Canyonleigh BESS (SSD-78247462) at 962 Canyonleigh Road
- Council has lodged comment regarding the SEARS for Cleary Bros Marulan Quarry (SSD 77991709) at 684 Carrick Road (approximately 1km south of Brayton Road)

As discussed in the report to Council of 19 July 2022, the current acceptance of a road maintenance contribution does not allow the roads to be upgraded and maintained to an appropriate standard. An alternate method needs exploration which should also allow for future developments to be included.

RECOMMENDATION

Council does not object to the proposed increase in truck movements.

That the widening of Culvert F, as recommended in the report to Council of 19 July 2022, be included in the scope of works to be completed prior to commencement of the increase in truck movements.

Due to concerns regarding road safety and road asset damage and deterioration that the proponent be requested to bring forward the *Transport Options Review* required by Condition B49 of the current consent with the report to include an analysis of the proposed increases in truck movements pertaining to this development and with due consideration of other potential State Significant Developments proposed in the vicinity that will also use this transport route. The report should include an analysis of road safety, accelerated pavement damage and a review of financial impacts (need to adjust current contributions) and the ability for Goulburn Mulwaree Council to fund any accelerated pavement damage.

That Council continue to seek a Planning Agreement with the proponent regarding road maintenance for the haulage route in keeping with the methodology presented in the report to Council of 19 July 2022.

Should you have any questions in relation to the above, I can be contacted on (02) 4823 4464.

Yours faithfully



George Angelis
Director Assets and Operations

15.25 GUNLAKE CONTINUATION PROJECT - RESPONSE TO SUBMISSION REPORT**RESOLUTION 2022/238****Moved: Cr Bob Kirk****Seconded: Cr Jason Shepherd****That:**

- 1. The report from the Director of Operations on the Gunlake Continuation Project Response to Submissions be received.**
- 2. Council seeks to enter into a Planning Agreement with Gunlake to address the outstanding Pavement Width, Pavement Integrity and Developer Contributions matters as outlined in the report to Council dated 19 July 2022.**
- 3. Council requires all actions identified in the Road Safety Assessment Report for the Primary Transport Route to be implemented prior to commencement of operations.**
- 4. Detailed road upgrade plans for all required works must be submitted to Council for approval in accordance with Section 138 of the Roads Act 1993 or as outlined in the Planning Agreement.**
- 5. Any proposals for the future use of haulage trucks beyond the currently approved higher mass limit B-Doubles (25/26m) on the Primary and Secondary Haulage Routes will prompt a structural assessment of bridges and culverts along the Primary Transport Route.**
- 6. GMC continue to advocate with Transport for New South Wales and the NSW Government Local Member of Parliament that the speed limit for the Primary Transport Route be reduced to 80km/hr for all vehicles.**
- 7. If a Planning Agreement is not executed, Council request the NSW Department of Planning and Environment (DPE) to impose the following conditions of consent to address the matters as outlined in the resolution of Council dated 16 November 2022:**

Prior to the consent becoming operational, written confirmation is to be provided from Council demonstrating that the following matters have been addressed by the applicant:

- a. A 3m clear zone be implemented along the entirety of the primary haulage route, or alternatively the use of safety barrier in locations where this cannot be achieved, including a plan identifying when the works will be undertaken.**
- b. Provision of a Wide Centre Line Treatment through all affected culverts (Culverts A-F) along the Primary Haulage Route. Prior to endorsement Council will require a written commitment from the applicant that identifies the timeframe in which the works are to be completed.**
- c. Provision of documentation demonstrating that the pavement of the entirety of the haulage route (incl. the secondary haulage route) can achieve the required minimum 10 year expected lifespan. This documentation must include a desktop audit by an independent geotechnical consultant (of whom the appointment will be made upon the agreement of Council and the applicant) to validate the methodology used to determine pavement life.**
- d. The applicant must pay to Council a financial contribution toward the maintenance of Council roads along its primary and secondary transport routes. The contribution must be determined in accordance with the Goulburn Mulwaree Local Infrastructure Contributions Plan 2021, any subsequent relevant contributions plan adopted by Council, or in accordance with any Planning Agreement or otherwise entered into by the applicant and Council.**