

## **SSD 12469087 - Gunlake Quarry Continuation Project 2021**

**Submission by Ron Switzer, 'Pinelodge' 15174, 15176 Hume Highway, 123 Ambrose Road (formerly 15176 Hume Highway), Marulan NSW 2578 (bordering along Ambrose / Red Hills Roads)**

**I oppose any increase in haulage trucks by Gunlake**

**The NSW Government (DPIE) should NOT approve any more trucks on Brayton, Ambrose, and Red Hills Roads, Marulan, and onward to Sydney via the Hume Motorway.**

**If the NSW Government / DPIE considers additional product from this quarry is that significant to Sydney, it should work with, and support, Gunlake on a rail haulage capability.**

**A long-term strategic approach to materials haulage is needed for the area.**

We are significantly adversely impacted by this proposal which essentially seeks approval to (again) increase truck haulage daily movements from a current 590 maximum to 750 (almost 30% increase). The 2017 L&E approval was 490 total daily movements (almost 55% increase from 2017). A 4.2Mtpa production is also proposed.

This submission is not opposed to the quarry, I am opposed to more trucks.

The EIS poses some questions:

1. What does another 160 truck movements per day (Marulan to Sydney and return) contribute to:
  - a. Enhancing property values in the impacted areas? – Zero
  - b. The environment & Emissions reduction, air, noise & visual pollution? – Zero
    - i. Surely environmental protection must be essential and in line with government policy priorities as we head to 2030 and 2050 targets of net.
  - c. Road safety, road congestion and wildlife roadkill (Marulan area, Hume Motorway and Sydney)? – Zero

- d. The overall semi- rural nature of the area – Zero (there are hundreds of property owners in the area, lifestyle and agricultural, all pay rates and spend in the local economy)
2. Will this be the last Gunlake application for more trucks? On history probably not.
3. What is a truck? A single tray, B-Double, B-Trippl, B-Quad, Road Trains or some other future combination?
  - a. What does it take to transport 4.2Mtpa?
4. What about the potential next quarry, Will DPIE approve yet more trucks? Cleary Brothers have signalled a new quarry nearby potentially using the same haul route although transport proposal unknown. (Newsletter to residents 7 September 2021 and survey).

We have owned the property known as 'Pinelodge' for 30 years that runs from the intersection of Red Hills Rd and the Hume Highway for approximately 2km towards Brayton Rd along Ambrose Rd to the culvert.

This is yet another submission, in addition to our formal objections, to **any** increase in truck numbers along this route to the DPE dated 12 May 2016, verbal statement to the public meeting on 30 June 2016, written submission to the PAC for their hearing on 31 January 2017 and verbal and written submission to the Land & Environment Court Conciliation Hearing on 14 June 2017 and again in February 2021 to LEC 2017/108663 Consent Modification 2.

**My contention is that the Gunlake proposal for additional trucks will:**

- **Impair the value of all surrounding properties (prior approvals probably already have)**
- **Impose an unacceptable safety risk on our roads**
- **Significantly add to environmental pollution through diesel fumes, visual pollution, noise and rubbish**
- **Have no significant local incremental economic benefit**

It would be fair to say the community, and particularly those more directly impacted, are completely over again reading and analyzing long consultant reports and writing submissions. No more piecemeal approvals.

The community has spoken clearly against truck increases in earlier submissions with some 50 objections, public forums, countless discussions, and Land & Environment Court hearings.

In 2017 the PAC, set up under S23B of the EP&A Act as ‘an independent panel of experts’ to ‘determine applications for major developments’, had also made a clear determination, quote:

**“The Project as proposed will have unacceptable social impacts, including negative road safety outcomes, and is not in the public interest.”**

I overwhelmingly support this prior PAC determination.

The Land & Environment Court, regrettably, subsequently overturned this.

### **Haulage Trucks, Traffic Volumes & Safety:**

The subject haulage roads are inherently unsafe for additional trucks in ideal conditions. That is without fog, sun glare, breakdowns and the huge population of kangaroos and wombats randomly crossing the roads particularly in the evenings and mornings, then add speed and human error. This route should have never been intended by Gunlake, nor was understood by the community, to ever carry anywhere near the proposed volume.

Whilst not Gunlake’s problem, the route effectively bypasses the Marulan Heavy Vehicle Checking Station, there is already an unacceptable volume of ‘illegal’ truck traffic entering via Wollumbi Road of from Marulan township re-entering the Hume Motor way via Red Hills Road or Wollumbi Road. The DPIE should also consider addressing this issue.

Figures 5.8 and 5.9 in the Traffic Assessment Report are uninterpretable perhaps other than to road engineers, there is no table summary for current and future traffic volumes at say 5- or 10-year intervals. I hope DPIE can make some sense out of it and present a meaning summary to the community of traffic impacts over time.

However, it would seem a reasonable estimate to foreshadow more than 1,000 vehicles per day on Ambrose Road in the not-too-distant future.

Assuming, 85% traffic between 5am to 9 pm, this is a vehicle every approximately every 55 seconds for 30 years.

The 110Km/H acceleration lane onto the Hume Highway is right outside our gate and that of our neighbour's property. This will make access to the main entrances of our properties more dangerous than it already is when crossing Red Hills Rd from the Hume Highway. Similarly access to other entry points along Red Hills and Ambrose Roads, necessary for farming activities, and any future developments are already compromised and unsafe. Plus, the already dangerous intersection from Red Hills Road (Wollumbi Road direction), the Brayton and Ambrose Roads intersection, and limited sight distances on sections of the roads. This road is totally unsuitable for more trucks.

It is also unacceptable to allow this vast number of additional trucks onto the Hume Highway travelling to and from Sydney, a route carrying too many trucks and potential accidents, traffic volumes are likely to increase over time as the main Sydney / Canberra / Melbourne route.

Whilst the current reported level of incidents on the haul route is low it is highly unlikely that serious incidents will not occur as the traffic volumes increase.

### **Environment & Pollution:**

The EIS and Air Quality Impact Assessment are also difficult to interpret for a non-environmental engineer. What are the real measurable impacts of the level of trucks on?

- **Environmental pollution**
  - **What is the truck related GHG emissions?**
  - **Are the additional truck emissions from this EIS acceptable?**
- **Noise pollution**
- **Visual pollution**

I cannot find any reference to the GHG emissions from the haul trucks in the Air Quality Impact Assessment? What is the real impact on the environment?

Air pollution for 750 truck movements in the Marulan area and all the way into Sydney is excessive and contrary to any consideration for health and carbon reduction targets.

DPIE should undertake an independent study of the greenhouse gas emissions from this proposal.

Hume Motorway noise is now excessive and at times unbearable – now add more trucks in the haul route corridor? Note all the truck movements must also bypass Marulan township twice as they turn at the South Marulan overpass. The noise studies seem to be in the ‘now’, it is the cumulative future impact for the next 30 years on the future residents in the township and along the haul routes. Particularly on clear days and still nights the noise travels long distances.

Trucks are unsightly; similarly, this has not been addressed. We have already spent some thousands of dollars planting screen trees.

The NSW, Federal and Local Governments have a stated commitment to environmental protection and pollution reduction. There is no better opportunity to demonstrate that commitment now.

### **Diminution in Property Values & Social Impact Assessment:**

Some observations around the Social Impact Assessment:

In my opinion, the study can, at best, be described as a limited desktop review.

- Only 5 residents contributed to the assessment. Only 2 were on the haul route. I was one of the interviewees. All were members of the CCC.
- My involvement was at my request having been alerted to this in a CCC meeting late in the EIS process. This may also have been the case for the other 4 respondents.
- Gunlake did not promote to the community the opportunity to participate nor did the consultant undertake an appropriate statistical sample.
- The consultant undertaking the interviews is Queensland based (advised to me during my interview) and has not personally visited and studied the haul route, Marulan township and surrounding areas. I consider visitation essential to understand and emphasise with a community.
- There was one representative interviewed from 8 community organisations selected by Gunlake. At least five of these received direct support from Gunlake. There was no apparent disclosure of possible conflict of interest.
- There was no community meeting post lodgement of the EIS due to Covid restrictions. The last community meeting with Gunlake was in

December 2020, also under Covid restrictions limited to 'one on one' by appointment.

- The Gunlake Community & Stakeholder Relations representative was present on the interview telephone calls. This may have constrained comment from some respondents.

There are around 250 properties in the areas along the haul roads and close surrounds, through to Brayton, Big Hill, Greenwich Park and Towrang (Bulls Pitt, Carrick and Towrang Roads) who use the haul route regularly or intermittently and potentially impacted – it would seem only 2 people were interviewed.

The impact for local landowners (haul route and Marulan township northside especially new and future subdivisions) will only be downside. I consider it a reasonable assertion that the unrelenting noise of hundreds of trucks rumbling past day and night will impair our property values and limit any future development potential. Those commuting along the haul roads from outlying areas will suffer increased travel times, potential road closures or delays, (accidents, continuous repairs) which will likely also detract from the appeal to live in those areas.

Who is likely to buy a property for a country lifestyle with hundreds of trucks rumbling past day and night, or traffic frustration to reach their property?

Marulan and surrounds are expanding and a desirable area to live. Closer to the township houses are being built and subdivision being developed along Brayton Road. They are buying their blocks of land, to build a house and enjoy a peaceful surrounding. They could have a very unwanted surprise when they hear the noise of trucks in the night climbing the very steep Ambrose Road Hill.

No serious consideration of potential diminution of property values has been undertaken or consideration of compensation.

### **Economic:**

The community expects a strong economic benefit to NSW and the community. Employment increments at the quarry site is marginal. The only significant employment increase is from more truck drivers, demographics unknown, but unlikely to be significantly local. Do we want a post pandemic truck led economic recovery?

It should be noted that in addition to some 1,600 plus current Marulan town these are hundreds of properties around the broader area. All pay rates and many will use the services Marulan has to offer contributing millions of dollars annually into the local community. It is not a 'quarry' town as some contend but a vibrant location for rural, lifestyle and commercial activity and the town and surrounding areas will continue to develop given its location. More trucks will do nothing to enhance the regions appeal.

The incremental employment of quarry staff would still presumably proceed under a dedicated rail option without using any public roads.

**Gunlake can potentially extract 126,000,000 million tonnes of material over 30 years, paying no royalties. The major beneficiaries are shareholders of Gunlake, a private, non-publicly listed group. Assuming an ex-weighbridge price (unverified) of \$30 per tonne this equates to around \$3.8 billion or annually \$126,000,000. Prima-facie should be sufficient to invest in rail haulage infrastructure.**

The PAC also previously concluded, there had been no serious challenge through independent and expert analysis (both objective and subjective) to the Gunlake EIS. Will there be an independent assessment on this proposal?

There are no safeguards, conditions or guarantees in any of the documentation to protect the local landowners' interests, public safety or the environment.

### **Long Term Transport Solution**

In the Land and Environment Court judgment of 2017 Gunlake is required to undertake a transport operations review within 10 years. The department must require a proper independent and transparent assessment before any further approval. One commissioned by the Department.

Other quarry operators in Marulan use rail, it must be feasible and there is already some existing infrastructure. The pre-existing road usage levels are still available to Gunlake. Will rail be more expensive? Most likely in the short term until build costs are absorbed. Is it a price worth paying? Of course, safety, environmental protection and community quality comes at a price.

To summarise:

1. No approvals for any more haulage vehicles for any quarry or proposed large-scale enterprise in the area.
2. The Gunlake expansion is very long-term generating significant revenue and presumably profits. Gunlake can always maintain their existing approval or withdraw the expansion application if they cannot generate sufficient return on capital with rail transportation. It seems other quarry operators in the area can provide proper infrastructure and operate profitably.
3. Undertake an independent study (not Gunlake funded) to develop a long-term strategic approach to materials haulage utilising rail for the region.

**There should be NO APPROVAL for increased trucks proposed in this EIS**

Thank you for your consideration.

**Ron Switzer**

**Director**

**M. G. & R. Switzer Pty Ltd** (owner of the property)

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