

T Shepherd
136L Obley Road
DUBBO NSW 2830

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Dear NSW Department of planning,

I am writing to express my concerns over a number of issues that are raised by The Environmental Impact Statement (EIS) submitted by Alkane. As a landholder on the Obley Road, less than 10 kms from Toongi I feel that I should have some say into the change of road use proposed by Alkane.

Firstly, I am extremely disappointed in the lack of communication between Alkane and the landholders on the Obley Road. There has been no attempt to contact us or provide us with information regarding the Dubbo Zirconia Project at Toongi. I am aware there has been discussion in the media and was informed about the first community meeting by a neighbour. Unfortunately at no time has Alkane made any effort to contact me directly or provide me with information. I note in section 3.2.1.1 that Alkane is *"committed to maintaining open lines of communication with these stakeholders through individual discussions, group meetings or community newsletters"* As a landowner living on the Obley Road less than 10kms from the proposed site I find it concerning that I have not been invited to community consultation meeting by Alkane, nor have I received any community newsletters, despite the fact that Alkane has distributed *"in total, eight newsletters"* (Section 3.2.1.5). This leaves me very worried about the future relationship that Alkane will have with its neighbours during the mine's operation.

Secondly, I am concerned about the impact that increased traffic will have on road safety. Alkane has proposed in its EIS three transport options (Section 4.12). Only option A explores the use of the existing railway line to Toongi. According to the figures in table 4.75, the current AADT past our property is 390. Without using the rail line, in less than 3 years' time, during the operation phase of the mine this number will more than double. Whilst it is expected that traffic will increase during the construction phase, surely to minimise the impact during operation Alkane should be required to use the rail line. Alkane admits in their report *"simplest and cheapest option would be to operate a road transport fleet"* (section 6.1.7). Impact to existing landholders must be considered and Alkane not allowed just to choose the cheapest option for them. The cost of upgrade to the rail line has been estimated at \$30 million, this is only 0.7% of return on the estimated value of the mine (\$4.25 billion value). I would like to see Alkane commit to use of the rail line, at present the only commitment they make is to complete a feasibility study *"within 5 years of approval being granted"* (section 2.12.1). This means with operation starting in 2016 that the decision to upgrade the rail line may not be made until 2020. Alkane have been investigating Toongi for many years including running a study at ANSTO since 2008 (Alkane, 2013), Why has this study not already been done?

There has been opposition to the use of the rail line by Dubbo residents who live close to it. At no time has the rail line been decommissioned and the potential for it to return to use has always been

there. With only 3 train movements per week the impact on residents is surely minimal compared with doubling traffic on a local road?

Obley Road is a local road that has limited number of overtaking areas due to its windy nature. Already travel time into Dubbo becomes increased when you are caught behind a truck. Option B and C show that truck numbers on Obley Road will nearly double (Section 4.12). Thus indicating that, despite improving the road, travel time into Dubbo will increase. Alkane indicate that they will partially offset noise and traffic issues by improving the road, what guarantees are in place to ensure that this will happen? How is this possible, without the use of the rail line?

This concerns me personally; our driveway onto Obley Road is just over a rise in the hill. How if truck numbers are doubled will it be safe for me to turn into my driveway with a B-Double bearing down behind me and one coming the other way? According to NSW RTA, heavy vehicles account for 19% of total fatalities on NSW Roads (Department of NSW Transport, 2011). Also their data shows that the majority of single vehicle heavy truck crashes and single vehicle heavy truck fatal crashes occur on country rural roads with over 60% of heavy vehicle crashes involve an off path movement on curves. (Department of NSW Transport, 2011). Given the windy nature of Obley Road why isn't the rail option being guaranteed to avoid such fatalities as seen recently on Cunningham Highway at Aratula (Brisbane Times, 2013)

As a mother of 3 primary aged school children I am also concerned about the impact of increase traffic on school bus safety. Alkane fails to mention in section 4.12.2.2 that currently on Obley Road there are TWO school bus routes. It also inaccurately states that the number of bus stops between Oakdene Road and Dubbo and neglects to mention any bus stops further ion towards Toongi. The EIS does indicate that school bus times will be avoided (section4.12.4) where are the restrictions guaranteeing this? Currently my children are picked up in front of our house. Will this mean that buses can no longer pick up children from in front of their houses because 2 two B-Double trucks passing each other as a bus is pulled over is too dangerous?

Furthermore Obley Road recently has become a tourist drive and the smaller communities past Toongi, namely Yeoval, Cumnock and Molong have worked hard to boost numbers to their towns through *The Animals on Bikes* initiative (www.animalsonbikes.com.au). A number of sculptures line the Obley Road between Toongi and Dubbo, including hanging in trees close to the road. Alkane neglect to mention what will happen to these sculptures when the road is widened and how will they guarantee the safety of tourists who pull over on the road to look at these.

The impact on landholders and road users by the Dubbo Zirconia Mine Project will be significant if a rail option is not part of the transport arrangements for the mine. I would like to see Alkane be required to commit to use of the rail line and thereby committing to the option of lowest impact and keeping Obley Road as safe as possible for my family.

Tamara Shepherd

References

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