

Submission pertaining to the Dubbo Zirconia Project (DZP) proposed by Alkane at Toongi NSW

My main concern regarding the proposed project relates to the substantial increase in vehicles travelling along Obley Road.

Approval should not be granted unless the proponent agrees to;

1. undertake all road reconstruction before mine construction commences, and
2. reconstruct the Dubbo-Toongi rail line and use it at all times to the maximum extent to minimise increased road traffic.

The proposal by the company to defer the reconstruction to the existing rail line until 2020 means, in fact, that the company has no intention at all of ever utilising rail for the conveyance of people and materials.

The Obley road is a two lane country road that joins Dubbo to Molong.

While the EIS describes the amount of traffic on this road as 'light' no data has been presented to substantiate this description.

In addition to the considerable amount of local traffic, it is used as an alternative to the Mitchell Highway by both locals and travellers.

It is an alternative route should the Mitchell Highway become obstructed because of a Motor Vehicle Accident (MVA) or roadworks.

It already carries a considerable volume of traffic and the proposed increase in both heavy trucks and passenger vehicles associated with the construction and the operation of the mine will substantially increase this amount.

Between Dubbo and Toongi the road is subject to flooding at five separate locations to my direct knowledge. Two of these sites are not considered for improvement (Zoo creek and Dundullimal creek).

The standard of road construction, both in width and ability to carry heavy trucks, is variable along the road between Dubbo and Toongi.

It is suggested that the proposed increase in heavy traffic will cause considerable damage to the road.

There are also some unforgiving bends on this road that have been the locations of MVAs in the past including a number of fatal accidents.

Whilst Alkane has suggested improvements will be made to this road there is little specific information available about when the proposed improvements will be completed.

As a direct consequence of the increase in traffic there will also be an increase in the number of MVAs.

I am a member of the Cumboogle Rural Fire Brigade and it is our volunteer members who will be called out to attend these incidents.

Experience shared by Mudgee area brigade members indicates a very substantial increase in call outs associated with MVAs involving traffic to the Ulan area mines and there is no reason not to expect a similar increase associated with the Toongi mine. The EIS at page ES 22 suggests there would be **no** increase in MVAs! The proponents are in denial!

There has been no recognition of the potential increase in MVAs in Alkane's plans nor has there been any contact between Alkane and the Cumboogle brigade or to my knowledge the RFS.

The Obley road is also a school bus route which of course involves frequent stopping and many of these stopping areas do not have adequate existing road widening potentially making bus stops a high risk area with truck movements. Again the EIS fails to address these issues.

There are a number of potentially dangerous intersections between Dubbo and Toongi which will be a cause of concern for especially heavy trucks.

Some of these include the intersection of Obley Road and the Newell Highway, the entrance to the zoo, Dundullimal Homestead and Benelong Road intersection.

The zoo entrance, particularly in school holiday times, is frequently so congested that traffic builds up at a standstill from the Newell Highway to the zoo entrance.

There are also a number of poorly aligned corners of the Obley Road particularly the one just south of the Camp Road intersection – a site of many accidents in the past.

There are also quite a number of concealed entrances especially those on the crests of hills along the length of the Obley road.

The rail corridor is available for redevelopment and in fact the company proposes to construct a gas pipeline from Dubbo to Toongi along this corridor. Rail reconstruction should occur at the same time.

In the Executive summary on page ES 10, the statement is made that “the following infrastructure and other site features would **first** be established”.

These include the Dubbo-Toongi rail line (Fig D) and upgrades (pavement & creek crossings) to the Obley Road (Fig E). In respect of the rail line between Dubbo and Toongi, Figure D fails to show all 9 level crossings. This number (9) of level crossings is mentioned on page ES 22 – the diagrams and the text don't coincide. Further in section 2.2.4.4. There is mention of the rail crossing that would need to be re-established on Cumboogle Road, however it is incorrectly described as a single lane road. There is no photo of this level crossing location in the plate series 2.2 to 2.8 (page 2-20).

Figure E shows very minimal road improvements proposed for the Obley Road,

- No intersection upgrades are shown in respect of the entrance to the Zoo, Camp Road, Cumboogle/Belmont roads, Benelong Road and Oakdene Roads.
- Only 3 very short sections of road widening are proposed – inadequate
- 3 sections of curve realignment are shown which are satisfactory

On page 2.24 the list of intersections is incomplete with the following not being included;

1. Entrance to Dundullimal homestead (National Trust) and the car park for the Tracker Riley pathway and access to the reserve (This is opposite the proposed additional entry to the zoo (now completed). Both these intersections are on a crest and curve and are potentially dangerous intersections with much of the traffic using them being tourists who being unfamiliar with the area tend to drive quite slowly when navigating them. It is suggested that additional turning lanes are required for safety at this site.
2. Entrance to the 'Riverview' subdivision which is almost opposite Belowrie Road. Again this intersection is on a crest and curve and is potentially dangerous.

There is no information about any proposed improvements to the other intersections listed.

There is no commitment that the (inadequate) proposed road works will be completed before the commencement of mine construction.

On page ES 12 under the heading Traffic and Transportation it is suggested that a combination of road & rail will be used. However due to the costs involved, the proponents wish to delay until 2020 the commencement of work on the rail line.

It is suggested that there considerable freight to the proposed mine site during the construction phase and once the mine is operating there will be little incentive to open the rail line meaning it will never be used.

The figures for weekly truck movements only relate to movements during operations. No estimates have been provided for truck movements during the construction phase. The 138 truck movements proposed per week in Option C – Road amounts to 20 additional trucks per day every day of the week. The proponents have given no indication of the times that truck movements will occur and so it is difficult to gauge the real impact of truck movements. I have been unable to find information regarding the increase in passenger vehicle traffic associated with the mine.

Further the issue of noise associated with truck movements, especially on rough sections of Obley Road, e.g. Cumboogle Creek Bridge, have not been addressed.

There are a number of water pipelines extending west from the Macquarie river which will be impacted by the proposed gas pipeline to be constructed in the railway corridor. The EIS does not mention this fact and the need to ensure that they are not damaged during construction.

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