

Gunlake Quarry Project Modification Application - 2 Submission

Gunlake Modification Application

1. Gunlake are seeking authority to increase production at its Marulan quarry by 50%.

Yet Gunlake's Modification Application advises that;

Project Area	Current Area	Modification (Additional to Current Approved Area)
Overburden Footprint	1.0	3.5
Quarry Footprint	6.0	5.8
Project Area (disturbed)	19.9	9.3

This suggests;

- **The Overburden Footprint will increase by 350%**
- **The Quarry Footprint will increase by 96.66%**
- **The Total Project Area will increase by 46.73%**

Clearly, such a major expansion will have a very significant impact on the local community.

2. Gunlake also advise they could continue at this increased rate of production for "in excess of 100 years"
3. This will have a severe impact on local roads, traffic noise, road safety, and the quiet enjoyment by local residents of the rural environment as a result of increased quarry noise dust and light emissions.
4. Further, Gunlake is proposing to move these additional quantities of crushed rock to Sydney by road.

Increased Heavy Truck Movements

5. The Modification Application submitted by Gunlake advises "Increased truck movements to an average of 82 laden trucks per day."
6. This will result in 164 total truck movements per day when unloaded trucks on the return journey are included.
7. This proposed increase in truck movements will result in;
 - **492** loaded truck movements per week (based on proposed 24 hours per 6 day per week operations)
 - **984** total truck movements per week
 - **25,584** loaded truck movements per annum
 - **51,168** total truck movements per annum

8. The Gunlake application suggests these truck movements are intended to occur across the proposed **24 hours per day, 6 days per week** operational expansion sought.
9. Gunlake's Modification Application indicates intended **truck payloads between 39 and 44 tonnes**, but anticipated **average truck payload of 32.5 tonnes**.
10. It is inconceivable how Gunlake can conclude they;
 - ***"do not anticipate any road infrastructure will require installation or modification to enable the increased truck movements."*** or
 - ***"Upgrades to the roads and intersections are not required."***
11. Brayton Road is already suffering serious damage from the current level of truck movements from Gunlake Quarry.
12. Contributions made pursuant to s94 of the *Environmental Planning and Assessment Act 1979* appear to be grossly inadequate to compensate for the damage being caused by Gunlake to local roads. Further, there appears to be no mechanism by which s94 contributions are tied to repairs required to these roads. As a consequence Gunlake is causing major damage to local roads and do not appear to be required, at law or by practice, to make good that damage.
13. Brayton Road is a narrow rural road designed to connect rural properties and residences with the village of Marulan. Brayton Road is also used by the local school bus.
14. Further, given the nature of Brayton Road; being a local rural road with its inherent narrowness, many curves, bends and rises, it is not appropriate to be used as the only route between a major hard rock quarry development and the Hume Hwy, by which Gunlake trucks then travel to Sydney.
15. Use by Gunlake of Brayton Road for the movement of 82 trucks per day each laded with some 32 tonnes of crushed road, plus an additional 82 truck movements of unloaded trucks, is causing a very serious safety issue. The risk of serious if not fatal accidents along Brayton Road is greatly exacerbated by mixing truck movements of this kind, 24 hours a day, with local residential and rural traffic.
16. It is noted that the nearby **Holcim Lynwood Quarry** is connected to the Melbourne – Sydney rail link by way of a spur line and is required to ship the bulk of its product by rail
17. A truly independent assessment, approved by local community groups, of the impact Gunlake are currently having on all roads and the increased impacts they will have if this Modification Application is granted is clearly required.

Proposal

18. It is suggested that Gunlake be required to connect its quarry operations with the nearby major Melbourne – Sydney rail link in order to ship its current licenced production quantities. The Gunlake Quarry is very close to this rail link and a short spur line should be required. This would remove all heavy truck movements off Brayton Road. It would also remove these heavy truck movements off the Hume Highway where they would also pose a major source of road damage and risk to public safety.
19. Until such a rail link is built any application for expansion should be denied.

20. Further, contributions pursuant to s94 of the *Environmental Planning and Assessment Act 1979* need to be substantially increased, to a level that is sufficient to full address all damage to all roadways used by Gunlake, and that these funds be tied so that they can only be used for remediation of the damage to public roadways caused by Gunlake trucks.
21. It is submitted that until Gunlake begin to make good the damage they cause to local roads the proposed expansion of Gunlake Quarry to rejected.

24 hour Operations

22. Gunlake's Modification Application seeks to extend the quarry operations from "**7am to 6pm Monday to Saturday**" to "**continuously from 6am Monday to 6pm Saturday**", in other words to operate **24 hours per day 6 days per week**. It is also proposed the quarry will operate **52 weeks per year**, save for public holidays.
23. The proposed extended operations will have a very significant impact on local residents in terms of;
 - Noise
 - Dust
 - Light impacts
24. Gunlake operations can already be heard from many residences in the hills surrounding the quarry site. It is anticipated that the sound from quarrying operations will be even louder and will travel even further at night should this Modification Application be granted.
25. Impacts from dust from the expanded operations will also have a major impact on local residents' enjoyment of the largely unspoilt rural environment.
26. Gunlake advise their proposed expansion will "*Extend the quarry footprint to the south and southeast*". It is noted that this is in the direction of the village of Marulan and surrounding residential areas.

Proposal

27. Gunlake should be required to adhere to the same high standards imposed and adopted by the Holcim Lynwood Quarry in terms of noise and dust suppression. The highest standards in noise and dust suppression must be applied to Gunlake's current operations as well as any authorised expansion
28. Light impacts from quarry operations on the surrounding areas have been a matter of major concern in and around the Towrang Valley. Holcim have agreed to make major reductions and reconfigurations to site lighting at the Lynwood Quarry in order to seek compliance with their Licence Condition 50, namely;

"The Applicant shall take all practicable measures to prevent and/or minimise any off-site lighting impacts from the development."
29. Gunlake should also be required to comply with a similar operating condition in respect to both current and any expanded levels of authorised production.

30. Gunlake should be required to adhere to a clearly defined *World's Best Practice* and take all practicable measures to prevent and/or minimise any off-site light, noise or dust impacts from their development on the district in which they operate.
31. It should be a condition of licence for any expansion that the increased overburden produced be used to create earth bunds, that can then be heavily planted with appropriate trees and vegetation, so as to create an effective buffer between the quarry operations and local residents in order to eliminate any effects from noise dust or light impacts from the site.
32. The quarry operated by Divalls at Towrang can be used as a model. This quarry has been designed so as to be shielded from nearby residences by thick vegetation and earth barriers. The quarry does not impact on neighbouring properties and its operational activities go almost un-noticed in the local community. Consequently Divalls are seen as a responsible corporate citizen and are in turn supported by the local community,

Community Enhancement Contributions

33. It is noted that Gunlake are not required to pay any form of royalty payment or fee for the raw materials they extract from the area.

Proposal

34. Gunlake should be required, as a condition of any Development Consent, to establish a **Community Enhancement Fund** and make significant and regular contributions based on quarry production output, i.e. a fee per tonnes of material extracted, to be allocated by way of a demonstrably independent committee to local community enhancement projects.

Community Consultative Committees

It appears that the Gunlake Community Consultative Committee propose to meet only twice per year and that membership is to be limited to those who take a supportive view of Gunlake's operations.

Proposal

The Gunlake Community Consultative Committee should be required to meet at least 4 times per year, if not more.

Membership of the Gunlake Community Consultative Committee should be open to all community groups who represent community members affected by the Gunlake quarry, including the *Cookbundoon Heritage Preservation Committee*.

Conclusion

I submit the Modification Application by Gunlake be rejected.