

OBJECTION TO GUNLAKE QUARRIES CONTINUATION PROJECT....SSD-12469087

1) OBJECTION SUMMARY

My objection is to the continued use by Gunlake of trucks to transport quarry product to Sydney. DPIE should reject Gunlake's application unless they adopt rail transport rather than trucks. Based on the first half of 2021 Gunlake's average daily truck movements are 250. Gunlake want to increase truck movements up to 750 per day 6 days a week. This represents a trebling of existing daily movements and adds up to 500 truck movements per day. Gunlake started a little over 10 years with approval for 100 average truck movements per day but continually get approval to increase with the latest just this year up to 440 average daily truck movements. Now they want to go to 750 – an almost eightfold increase in 10 years! Enough – this is never ending! As a previous State Manager Quarries for Pioneer Concrete I understand the need to supply hard rock from outside Greater Sydney. I support Gunlake's quarry expansion BUT they must use rail like the other comparable large quarries – Boral and Holcim.

2) MACRO PROBLEM

The problems of having 750 heavy truck and dog trailer combinations trundling each day up the Hume Highway and through the heavily populated suburbs of Sydney are obvious:-

GREEN HOUSE GAS (GHG) emissions from 750 trucks doing the 320km round trip from Marulan each day are equivalent to GHG emissions from [20 000] cars commuting in Sydney! The American Association of Railroads has determined that moving freight by rail rather than truck lowers GHG emissions by 75% on average. All three tiers of Government in Australia are committed to net zero emissions by 2050. The number one criteria for EVERY Government decision MUST be what is the impact of this decision on GHG emissions. This must lead to mandating Gunlake to use rail rather than trucks.

CONGESTION is another major problem both on the Hume Highway and suburban Sydney. The Hume Highway from the Southern Highlands and SW Sydney is a major commuter and visitor motorway. Already traffic is being severely disrupted by a conga line of B double heavy freight vehicles and quarry truck and dog combinations. This presents problems of delays, reduced productivity and frustration – all have a personal and economic cost. The problem is exacerbated when these 750 heavy trucks hit Sydney suburban streets. These streets were not designed for these vehicles. They are too narrow, undulating and worse full of pedestrians including children. THIS IS UNSAFE AND NOT SUSTAINABLE!

CRASHES AND BREAKDOWNS ARE INEVITABLE. Almost every day we hear about another truck breakdown or crash causing problems on Sydney roads. These are peoples lives and livelihoods that are being destroyed and/or compromised.

The above are just the major problems. The others are equally obvious – pollution; road damage; noise etc.. Need I go on? ALL OF THESE PROBLEMS ARE ELIMINATED OR SIGNIFICANTLY MITIGATED IF GUNLAKE MOVE TO RAIL TRANSPORT.

3) MICRO PROBLEM

Prior to Gunlake arriving 10 years ago the Brayton area near Marulan was a peaceful rural pleasant environment. Quarries are not good or desirable neighbours. They generate noise,

dust, pollution etc. 24 hours a day 6 days a week. It is testament to the resilience of local residents that they have accepted these setbacks in support of an essential industry and local jobs. This has not been easy as Gunlake seem driven by profits and not community. The insufficient cladding and sound proofing of the crusher is an example. If DPIE want to see best practice go visit Boral and Holcim. Trucks on Brayton Road and it's use as a quarry haul road is where locals draw the line. There are many problems:

CONGESTION is the biggest issue. It takes a car 5 minutes to drive from the quarry to the Hume Highway whereas trucks take 8 minutes. Clause 4.4.2 of the Transport Study says Gunlake can dispatch 40 trucks an hour or one every 1.5 minutes. This will be the case most of the day as truck movements increase to 750 per day. A schoolchild can calculate that if a car gets behind a truck at the quarry then it will be stuck there because of double lines for the next 7 kilometers to the Hume Highway – a delay of 180 seconds. If the car is fortunate enough to just beat a truck at the quarry it will catch up to the one ahead within 2.5 minutes then delayed for 90 seconds. So the delay for almost every passenger vehicle using Brayton and Ambrose Roads will be between 90 and 180 seconds. Table 6.1 in the Transport Study looks at Level of Service Standards and says delays of greater than 70 seconds are unsatisfactory! CLEARLY DELAYS OF 90 TO 180 SECONDS ARE COMPLETELY UNACCEPTABLE. CARS WILL BECOME FRUSTRATED AND CROSS THE DOUBLE LINE RISKING HEAD ON COLLISION. THIS IS HAPPENING NOW!

The Australian Road Research Board (ARRB) study of congestion problems included in the EIS package is totally inadequate. They simplistically only evaluate Level of Service for light vehicles on Ambrose Hill. Yet inexplicably they state in Appendix B that Austroads (2021) says that is a totally inadequate evaluation and that the significant 7 kilometer road length of Brayton and Ambrose Roads should be evaluated. Specifically evaluation should consider the percentage of slow vehicles; overtaking lanes; adjoining sections etc.. THE CLEAR CONCLUSION IS THAT THERE SHOULD BE OVERTAKING/CLIMBING LANES ON AMBROSE HILL AS WELL AS ON THE INCLINES ON BRAYTON ROAD.

SAFETY IS ANOTHER HUGE PROBLEM. The most heavily trafficked intersections are Brayton/ Ambrose and Ambrose/ Red Hills Roads. These intersections have inadequate sight distances. Appendix F1 Traffic Impact Assessment in Clause 6.2 quotes Austroads Guide to Road Design as stating the Minimum Safe Intersection Sight Distance is 285meters. For a quarry truck turning from Ambrose Road onto Brayton Road heading NWest the sight distance towards Marulan is less than 150meters. Cars are approaching this intersection from Marulan at 100kph. This is beyond dangerous. This intersection requires major upgrading including a "seagull" configuration as exists at the quarry entrance to Brayton Road. The intersection of Red Hills/Ambrose Roads has similar significant sight line deficiencies which need to be addressed with merging lanes or similar. A further problem often encountered by cars but not addressed is regular truck breakdown on the very steep climb up Ambrose Hill. Cars have nowhere to go and can even be rolled back on – very scary! The primary haul route is both congested and unsafe and will only get much worse. This is unacceptable for workers; families; tradies; school buses etc.. who use this road every day. Gunlake are advocating a reduction in speed limit from 100 to 80 kph. This is not what road users want and is unnecessary if the improvements are carried out to make the roads safe.

Of course the other Macro Problems including GHG emissions; dust; noise; road damage etc. are the daily lived experience of users of Brayton Road.

Despite being a civil engineer I am not qualified to do a proper comprehensive review of the traffic and road safety reports. MY CONCERN IS THE REPORTS CONTAINED IN THE EIS ARE

NOT INDEPENDENT AND CONTAIN OBVIOUS FLAWS AS POINTED OUT ABOVE. THEY DO NOT CONTAIN THE CERTIFICATION THAT THEY ARE “ NEITHER FALSE NOR MISLEADING “. DPIE SHOULD ENGAGE A TRULY INDEPENDENT EXPERT TO DO A TRAFFIC AND SAFETY AUDIT AND ONE WHO IS NOT PAID BY GUNLAKE. Irrespective Gunlake should be required to immediately do intersection upgrades and construct climbing/overtaking lanes. This is necessary to make the road safe now as well as the future as there will still be some quarry truck traffic even with the majority diverted to rail.

4) RAIL IS THE SOLUTION

In 2019 DPIE commissioned a study “ Supply and Demand Profile of Geological Construction Materials for the Greater Sydney Region “ undertaken by R W Corkery and Co (Corkery). Corkery identifies the existing and future road transport constraints and concludes “ mitigation of these will be achieved by increased use of rail “. Corkery refers to the Government publication Future Transport Strategy 2056 which contains a strong commitment to increase the use of rail freight. Government appears aware of the necessity for quarry products to use rail where available. Gunlake is about 2km from the main southern rail line. The major quarries in the vicinity of Gunlake are compelled by Government to use rail for virtually all their product transport – Boral Peppertree 100% and Holcim Lynwood over 70%. Gunlake wants to produce 4.2mtpa which will make it larger than Boral 3.5mtpa and slightly smaller than Holcim 5mtpa. Gunlake should be compelled to also use rail.

Gunlake have resisted rail in the past instead pursuing the cheap short term solution of trucks. Boral and Holcim have each invested over \$250 million in their quarries. They have achieved world best practice in management of transport; noise; pollution and most importantly community cooperation. Gunlake have spent less than \$40 million on their quarry. Of course to shift to rail Gunlake will need to invest modest capital but there will be a massive financial payback. Corkery estimates the on road transport cost of quarry product is \$0.13/tonne/km compared to the on rail cost of \$0.04/tonne/km. So the annual savings for Gunlake trucking 4.2mtonnes a distance of 160km are a whopping \$60 million!

Gunlake is a hugely profitable quarry. It has a proven rock resource of 180 million tonnes and Corkery estimates the minimum ex quarry selling price is \$40 per tonne. Over the resource life Gunlake will generate revenue of over \$7 BILLION and cash profit of probably well over \$1 BILLION! Gunlake is not required to pay any Government royalty for extracting the resource. Gunlake Quarry is a gold mine!

Gunlake are expected to continue to oppose rail arguing it is unviable consistent with a Transport Options Review they did in 2016. I consider that review to be biased and self serving, No independent review was undertaken by DPIE. TfNSW in their February 2021 input to the SEARS requested Gunlake do another Transport Options Review now focusing on rail. In a letter to me dated 31/5/2021 Clay Preshaw, Executive Director DPIE stated that Gunlake would need to respond to this in preparation of the EIS. This has not been done – why not?

I actually don't believe another Transport Options Review with a predictable self serving result is necessary. Rail is eminently feasible and viable for Gunlake – look no further than the above simple analysis. DPIE MUST REQUIRE GUNLAKE TO MOVE TO RAIL THUS AVOIDING ALL THE PROBLEMS FOR THE BROAD COMMUNITY AND ADDITIONALLY BEING HUGELY PROFITABLE FOR GUNLAKE IN THE FUTURE.

5) COMMUNITY CONSULTATION

I am a regular user of Brayton and Ambrose Roads and am in contact with a number of other users. According to the EIS Cl 6.1.1 Brayton Road carries 800 vehicles per day. These road users come from a wide catchment area including Canyonleigh Road; Big Hill; Towrang Road; Long Swamp Road; Bulls Pit Road; Carrick Road etc. and number in their hundreds using the quarry primary haul route every day. As far as I can ascertain none of these road users have been consulted by Gunlake – no letter box drop; no information flyers; no public meetings – nothing. Apparently the only residents consulted by Gunlake are the less than 10 properties on the actual haul route. This is not community consultation!

In EIS Cl 5.3.1 Gunlake say they did in-depth interviews with local residents in July and August this year. I am part of a local group who have letter dropped over 250 users of Brayton Road and as far as I know none of them have been interviewed by Gunlake – so who did Gunlake interview? In the Gunlake Community Consultation Committee minutes of meeting on 27 August 2021 item 7 (e) states “ no interviews were offered to or information material provided to potentially impacted community members eg regular users of Brayton, Ambrose and Red Hills Roads “. This is nonexistent community consultation.

In Table 5.1 apparently based on interviews and previous DA's Gunlake state that the community in the past “ has not proposed rail transport “. This is blatantly false. I and a number of local residents have been involved in every DA from Gunlake since the quarry began and we have submitted to the IPC also. The main theme has been the request for Gunlake to shift to rail away from heavy trucks. DPIE should challenge the certification by EMM in their EIS stating “ the information herein is neither false nor misleading “.

I have seen only one small notice recently from Gunlake in a very limited circulation Marulan newsletter about the DA. It mentions 4.2mtpa and 228 jobs but absolutely no mention of 750 truck movements per day! Similarly DPIE had a notice recently in the Goulburn Post but no notification of up to 750 daily truck movements. How can this be accepted as reasonable consultation and information? It seems to be a cover up which should be explained by DPIE.

A final issue for anybody considering making a submission is the difficulty of the online process. It is confusing to access; intimidating to have to open an account and generally totally discouraging. Postal submissions are an option but with the significant delays due to covid and strikes any such submissions are unlikely to arrive in time. DPIE have apparently changed this process recently to result in this mess. They have also increased the number of objections to warrant an IPC from 25 to 50. This legislation is an absolute deterrent to reasonable community engagement.

DPIE SHOULD BE AWARE THAT COMMUNITY CONSULTATION ON THE CONTINUATION PROJECT HAS BEEN TOTALLY INADEQUATE.

6) SUMMARY OBJECTION RECOMMENDATION

- a) DPIE SHOULD REJECT THIS APPLICATION BY GUNLAKE UNLESS THEY SHIFT TO RAIL TRANSPORT
- b) DPIE SHOULD COMPEL GUNLAKE TO DO UPGRADES OF INTERSECTIONS AND CONSTRUCT CLIMBING/OVERTAKING LANES ON BRAYTON AND AMBROSE ROADS WHILE GUNLAKE TRANSITIONS TO RAIL.

