

411 Red Hills Rd
Marulan NSW 2579
8/5/2016

Executive Director- Resource Assessment and Compliance
Department of Planning and Environment
23-33 Bridge St
Sydney 2579

Dear Sir

Gunlake Quarry Extension Project

I wish to object to the extension of the project in its current form. I believe that the EIS is misleading, inaccurate, selective, full of unsubstantiated opinions and statements, does not address all of the requirements as set out in the Secretary' Environmental Assessment Requirements, dismisses alternative options without adequate investigation, and is self-serving towards the developers preferred option. I suggest that it is inadequate.

Secretary's Requirements

Transport

The Secretary has required Gunlake to make "a detailed assessment of any such option as is potentially feasible". All such feasible alternatives are via the Lynwood quarry (both road and rail). Such a study would require meeting with Holcim (the owner) to discuss access, operations and fees. Any meetings between Gunlake and Holcim on the matter have only been cursory at best. Holcim claim no meetings have been held.

Communications

The Secretary required Gunlake to consult with community groups during the preparation of the EIS. Communication has been limited to the publication Fact Statement No2 on the Gunlake web site and a link to the EIS. The only way that community members have become aware of the EIS is by word of mouth. There have been no advertisements, letterbox drops or meetings to discuss the project. A specific SEAC requirement was for Gunlake to discuss the proposal with the Red Hills Residents. This did not occur. No discussion on the preparation of the EIS was had with the Community Consultative Committee. No members of that committee were given a hard copy of the document or even advised when it became available on the internet.

To rely on the residents to access the internet for information on the project is totally inadequate. Many residents are not computer literate or do not have access to the internet. Without prior knowledge, it is not possible to know when time critical announcements are made on the web site without checking it on a regular basis. The web site is a suitable source for retrieving information, but not a place for time critical announcements.

Other Issues

Haulage Routes.

The existing haulage route was originally designed for a project of 250000 tpa. The project has been increased to 750,000 tpa with average truck movements of 164 per day up to a maximum of 320 per day. The proposal projects 440 movements per day to a maximum of 690 per day. This is along a quiet rural road that has a school bus route and will be operating for 24 hours per day 6 days per week. Between the quarry entrance to Brayton road and the Bypass road there are 8 residential houses within 25 and 150 metres of the road. Along the Bypass road there is a steep incline of ½ kilometre long and is inclined at 10 degrees. Fully laden B Double quarry trucks have to be in a very low gear to get up the slope. On return they need their exhaust breaks to descend the slope. The noise at night would be very significant and there are at least 6 houses within 2 kms in direct sight of the slope. No acoustic loggers were placed anywhere near the slope to measure the sound.

The number of bus stops along the route between the quarry and Marulan varies overtime depending on the number of children attending school. Up to the village outskirts there can be 8 children, but a significantly large number join there for the trip to school. The bus operates between 7.30 am and 9am, then 3pm and 4.30pm on school days. The numbers joining the bus in Marulan is significant as all quarry trucks heading south are required to go through the village.

The Bypass Road requires a proper acceleration lane to be built for joining the Hume Highway. The cost is put at \$4.5 m.

In the Transport Options Appendix page 32 section 7.1.1 para 3 the EIS states that traffic impacts on this option “are being effectively managed”. The community does not believe this to be that case with the ongoing impact of the trucks, noise and dust. The community has been forced to accept this haulage route, but with the proposed large increase in its use, it has become untenable.

Alternative Haulage Route

Option 4 in the EIS is a viable alternative (a route on private land to Lynwood quarry, then on the Lynwood road to the South Marulan Overpass to join the Hume highway). This option was dismissed as being uneconomic as it required a capital investment of \$15 m. Also because it would be on as yet undisturbed land and may impact on as yet unaffected residents.

The cost for the road to Lynwood is set at \$15 m including a bridge over the railway line. If this cost is amortised over 30 years the cost per tonne is \$0.25. A fee would need to be negotiated with Lynwood for the use of its road (approximately 3 kms). If the fee is assumed to be the same as Council’s sec. 94 figure of \$0.0462 per tonne per kilometre the cost to the Hume is \$0.14. Total cost to the Hume would be \$0.39 per tonne. The cost via the existing route is \$0.38 per tonne.

The alternative route is clearly economically viable and needs further investigation. The advantages of taking the traffic off the Brayton, the Bypass roads and from the village, onto a private heavy haulage route are immense.

Noise and Dust.

Traffic noise impact on residents would largely be eliminated by the use of the alternative route.

Considerable noise will be generated by the crusher which will operate 24 hours per day which will impact on sleeping residents. Despite the data from the acoustic loggers, the noise can be heard up

to 5 kms away. This can be totally contained by constructing a sound proof shed over the crusher (as Lynwood has done) and the use of water sprays would solve the dust problem.

It is clear that this quarry will be operating for many years and, in the future, may even be expanded beyond the present proposal. Proper arrangements must be made now, while it is possible, so as to be able to accommodate any future expansion.

It is my opinion that Gunlake has proposed a minimal expenditure project, that has scant regard for its impact on the community. This is hardly the behaviour of a good corporate citizen and one that will be in the Marulan area for at least thirty years. The community should not be expected to carry the avoidable detrimental impacts of this project.

Yours faithfully,

K M Wray

Resident