

Gunlake Quarry Expansion Project  
Environmental Impact Statement,  
April 2016.

The *Towrang Community Progress Group* (PCPG) represents the Towrang Community.

Towrang has a population of 314 people (2011 Census). The Village of Towrang is situated approximately 8 kms across the Towrang Valley from the Gunlake extension site.

The TCPG submits the proposal by Gunlake, as outlined in the Environmental Impact Statement and exhibited on the NSW Department Planning and Environment website from 4 April 2016, be rejected in its current form.

### **Gunlake Proposal**

Gunlake Quarries Pty Ltd are seeking planning consent to;

- Increase extraction of saleable hard rock products from 750,000 tonnes per annum to 2,000,000 tonnes per annum,
- continue to operations for 30 years from the date of approval,
- increase truck movements to an average of 440 per day, with a maximum of 690 truck movements per day, 24 hours per day,
- extend the quarry foot print from 45 hectares to 99 hectares (120% increase)
- increase infrastructure required to produce 2 m.t.pa. e.g. additional excavators, crushers, etc.
- conduct hard rock crushing, stockpiling, truck loading 24 hours a day (except Sundays)
- employ 7 more people at the quarry and 20 truck drivers between Sydney and the Quarry.

### **Cost Benefit Analysis**

The E.I.S. lists the **Costs of this project** to the community as;

<b>Project Costs</b>	<b>Project Benefits</b>
<i>Loss of Agricultural Production</i>	<i>Wage benefits to employment</i>
<i>Blasting Impacts</i>	<i>Non-market benefits to employment</i>
<i>Air Quality Impacts</i>	<i>Economic benefits to existing landholders (i.e. Gunlake)</i>
<i>Greenhouse Gas Impacts</i>	<i>Economic benefits to suppliers</i>
<i>Surface Water Impacts</i>	
<i>Ground Water Impacts</i>	
<i>Ecological Impacts</i>	
<i>Road Transport Impacts</i>	
<i>Aboriginal Heritage Impacts</i>	
<i>Historic Heritage Impacts</i>	
<i>Visual Impacts</i>	
<i>Net Public Infrastructure Costs</i>	

The E.I.S. also advises;

- Gross Receipts for the Expansion to Gunlake will be **\$1.424 billion**, over 30 tears
- “the extension project is estimated to have net social benefits to Australia of between \$21 million and **\$32 million** (including employment benefits)

Yet concludes, *“and hence is desirable and justified from an economic efficiency perspective.”*

The TCPG do not share this view.

### **Impact on Towrang and the Towrang Valley.**

The Towrang Valley has been acknowledged as a *“pristine rural environment where the natural beauty and the views are what attracts people to this region.”* Webb Australia Group Pty Ltd, (for Holcim Quarries)

The TCPG object to the Expansion Project on two grounds;

- 1. Noise**
- 2. Traffic**

#### **1. Noise**

At present crushing noise from Gunlake can clearly be heard by many Towrang residents living at various locations along Towrang Road, as well as side roads such as Narelle Lane, Arthurs Road.

At present, Crushing at Gunlake is only permitted between 7am and 6pm Monday to Saturday. Currently Gunlake crushing is conducted in the open air. Gunlake do not have nor use any type of sound proof crushing sheds, as are employed at the neighbouring Holcim Lynwood Quarry. The TCPG are concerned that the anticipated increase in noise levels and extended periods of operation, to 24 hours a day, will have serious impacts on Towrang residents' amenity and the quiet enjoyment of their properties and homes.

Gunlake acknowledge that “Operational noise levels for the proposed extension project are predicted to be above the current project approval limits and Power Sound Noise Levels at most assessment locations.” Gunlake also advise Assessment locations where significant noise level impacts are predicted are entitled to voluntary land acquisition upon request ...after all feasible and reasonable mitigation has been applied and if alternate amenity agreement cannot be made.” “Gunlake is committed to provide potential receiver based mitigation” to affected properties<sup>1</sup>

TCPG notes that noise testing has not been conducted by Gunlake at residences at Towrang or along Towrang Road. Gunlake are aware of noise complaints and concerns by Towrang residents.

TCPG find it regrettable that Gunlake do not propose to implement site based mitigation to anticipated noise levels. Instead they propose to adopt “reasonable” and “receiver based” mitigation measures, such as “upgrade of the dwelling façade elements.” One can only assume this would be limited to double glazing or in some cases increased sound insulation at properties deemed sufficiently effected, and what is “reasonable” may well be determined by Gunlake itself.

Such measures would mean that residents would then have to stay inside their homes to take advantage of these “mitigation” measures. Given that this is a rural environment which most have chosen so as to take advantage of large gardens and outdoors areas, to say nothing of the many farming properties in the area, such receiver based mitigation measures would be of very limited use or value.

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<sup>1</sup> Executive Summary, E.I.S. page 11

The TCPG do not have any confidence that Gunlake will take realistic or effective noise mitigation measures unless compelled by way of Development Consent conditions.

The only realistic option to address the acknowledged and already experience noise impacts from Gunlake, and which will be considerable exacerbated by the proposed expansion, is to adopt suitable site based mitigation measures. This can only be properly achieved by housing the crushing plant in purpose built sound proof shed.

Gunlake C.E.O., Ed O'Neil did, at a public meeting in Marulan in March 2015, when concerns over increased noise levels from the Gunlake Quarry were raised, give an undertaking to build a sound proof shed over their crushing plant and equipment to eliminate any such problem. It is disappointing that he has not followed through on that promise. Gunlake now do not propose to implement any effective site based noise reduction measures

Holcim have built precisely this type of shed at the neighbouring Lynwood Quarry. Various representatives from the TCPG have visited Holcim's Lynwood Quarry on a number of occasions. We have stood in the car park there, which is no more than 200 metres from the crushing shed, whilst it has been fully operational. There is no perceptible sound coming from crushing operations at all.

Holcim have gone to considerable lengths to mitigate their impact on the local Towrang environment and upon the amenity of Towrang residents. Holcim's written commitment to the Towrang Community includes;

- *Holcim will do everything practicable to ensure operational elements of the proposed granite quarry pit and associated works, including haul road traffic, plant and machinery do not impact the existing residences in the Towrang Valley and surrounds as far as is practicable in relation to noise, dust and vibration.*
- *Holcim will ensure that noise escaping from the granite pit operation will be minimised as far as practicable and will undertake noise attenuation measures as required..."*
- *All crushing of material from the granite pit will be conducted at the existing crushing facilities (the existing purpose built sound proof shed)*
- *When from time to time during the quarry licence period improved technical innovations emerge that would deliver an improved outcome to the above objective, Holcim will promptly adopt those innovations where practicable.*

Holcim have demonstrated how a large extractive industry can operate harmoniously and with a minimum of impact on a "pristine rural environment" and successfully cooperate and cohabitate with the local community, to everyone's benefit. The TCPG request Gunlake be required to follow suit and do the same.

Unless Gunlake undertake, and agree to Development Consent Conditions, to install a purpose built sound proof shed to house all crushing and processing activities at the quarry to a similar standard as that employed at Holcim's Lynwood Quarry, the TCPG must submit that **the current Extension Project be rejected.**

## **2. Traffic**

Gunlake propose increasing heavy truck traffic along Brayton Road, the Bypass Road, and the Hume Hwy to Sydney from the currently approved 164 truck movements per day to an average of 440 truck movements, with a maximum of 690 truck movements, per day. This represents an increase of heavy truck movements by, up to, 320%.

Brayton Road is a small country road built for local traffic. It is predominantly used by small passenger vehicles and local farm based traffic. Gunlake's E.I.S. reports that the section of Brayton Road to the west of the Gunlake Quarry and therefore not used by Gunlake traffic carries average weekday traffic of 278 vehicles per day, only 45 of which are "heavy vehicles." Gunlake's proposed Expansion Project would add up to 690 additional heavy vehicles per day. This would represent an **increase of 1,533%.**

It is expected that each truck will carry approximately 40 tonnes of crushed rock product.

Gunlake is proposing to run these trucks 24 hours a day. That is, on average, one truck movement every 2 minutes along this road. Given, the entrance from Gunlake onto Brayton Road, the intersection of Brayton Road and Bypass Road, the steep hills in the Bypass Road, the large amount of wildlife, the propensity for heavy fog in the area as well as normal local passenger vehicle traffic, there will unavoidably be considerable "bunching" of the Gunlake trucks.

This section of Brayton Road is also part of the local school bus run. There are numerous stops where children, being children, will often run across the road. Parents waiting to collect children are also parked along this proposed truck route.

Gunlake were requested by Secretary's Environmental Assessment Requirements, dated 13<sup>th</sup> October 2015, to include in its Environmental Impact Statement;

*Identification and description of all reasonable options to reduce transport of quarry products on local roads, including extension of the bypass road or use of either existing rail infrastructure at the Lynwood Quarry or new rail infrastructure, and a detailed assessment of any such option which is potentially feasible;"*

It is clear that Gunlake have failed to comply with this requirement.

Gunlake list in their E.I.S. , at Appendix D page 5, as a possible constraint to the use of the existing rail infrastructure at the Lynwood Quarry "whether Holcim (Australia) would be likely to agree to this use." Quite clearly Gunlake have not even raised the possibility of using the Holcim's facility as required in the October 2015 SEARs.

The TCPG have had discussions with Holcim concerning this possibility and as the 2<sup>nd</sup> May 2016, Holcim were advising that they are open to discussions with Gunlake concerning use of this facility, and that at that point at least Gunlake had not made any such approach.

Until Gunlake undertake a full, and independent "detailed assessment" of all transport options, including "use of either existing rail infrastructure at the Lynwood Quarry" as required by the October 2015 SEARs the TCPG must submit that this present E.I.S. and proposed Expansion Project by Gunlake be rejected.

#### **Failure to conduct public meetings.**

It is regrettable that Gunlake do not conduct public meetings to fully gauge the views and feelings of the community. The Gunlake CCC operate in a rather unorthodox manner and the Chairman has advised, **"AT THIS STAGE ED AND I HAVE AGREED THAT THERE WILL BE NO OPEN COMMUNITY BRIEFING"** This seems extraordinary.

Towrang Community Progress Group,  
Care of 188 Narelle Lane,  
Towrang, 2580

For the reasons stated above, the TCPG submit the Gunlake Expansion Project be rejected.