

**Geoff Pearson,
188 Narelle Lane,
Towrang, 2580.**

NSW Department of Planning
and Environment,
23-33 Bridge St.,
Sydney, NSW, 2000.

17th May 2016.

Dear Sir,

Re Gunlake Quarry Expansion Project

I have read the **Environmental Impact Statement (E.I.S.)** supporting the above expansion proposal and now register my strong objection to the proposal.

I note Gunlake's proposal to increase hard rock quarry products from **750,000 to 2,000,000 tonnes** per annum. Gunlake advise this will result in an increase of truck movements along Brayton Road and the Bypass Road from the currently allowed volume **of 164 per day** to an average of **440 per day**, and on some days up **to 690 per day**. It also provides for **24 hour crushing** rock product without any form of enclosure or sound proofing. This proposal poses a number of threats to the local, and broader, community. Two of the most significant impacts will be;

- **Inappropriate Traffic Levels**
- **Noise**

Inappropriate Traffic Levels

I note from the E.I.S. that the non-quarry related section of Brayton Rd currently carries an average of 45 "heavy trucks" per day. To increase truck movements by adding an additional 690 heavy quarry trucks a day represents an **increase of 1,533%** from the non-quarry level. It is also proposed to operate these trucks 24 hours a day. That will be the equivalent of one truck every two minutes. Such a massive increase on a small country road poses a major threat to the local community, local road users and the environment.

Road Safety

Brayton Road is a small country road primarily used by local traffic to service farms and rural residential properties. Brayton Road is also part of the local school bus run. People in the northern part of Towrang and Greenwich Park travel from Towrang Road along Bullspit Road to Brayton and then down Brayton Road to Marulan. Local residents travelling north to Sydney or the Southern Highlands also travel along Brayton Rd and the Bypass Rd to the Hume Hwy. My wife uses this road, as do my children. This massive volume of truck poses a huge safety risk.

These roads are also prone to thick fog, have several bends and turns and have large numbers of native wildlife crossing at all hours. The proposed volume of heavy truck movements on such a road is clearly unsafe and I believe it is highly irresponsible of all concerned to seriously consider such an option.

Road Damage

Brayton Road and the Bypass road are continually breaking up due to the current level of heavy truck movements. To increase truck movements, as proposed, will cause a marked and rapid deterioration in the road surface. This will of course greatly enhance the likelihood of damage to private vehicles and the possibility of a more serious accident.

State Roads

The risks and costs posed by this massive increase in heavy truck volumes do not apply just to local roads.

The additional trucks will also travel approximately 200 kilometres along the Hume to Sydney, adding risk to drivers there, creating greatly **increased traffic congestion, increasing exhaust and greenhouse gas emissions and creating considerable damage to the road surface along the Hume.**

The Solution

There is of course an obvious and simple solution. This constant flow of hard rock product should be shipped to Sydney by rail.

Gunlake advise they estimate they have **90 years of product** at their quarry in Marulan. The vast bulk, if not all of this, will be shipped continuously from Marulan to Sydney. The Gunlake E.I.S. estimates the cost for road transport to be \$0.125c per tonne per kilometre. The cost for rail is estimated to be \$0.066 c per tonne per kilometre. Clearly rail is the cheaper and more efficient option for such regular and continuous point to point shipping. The only apparent problem is that Gunlake do not want to make any significant capital investment in this quarry.

The Gunlake E.I.S. advises that Gunlake expect to receive “increased business turnover” of **\$1.424 billion** over the 30 licence period. Gunlake advise their anticipated capital expenditure on the project to be just **\$3.2 million**. This is clearly a totally unrealistic expectation. Other quarries in the same area have spent over **\$100m** to establish the necessary infrastructure to build a sustainable long term business that protects the local community, the broader community, local environment and the wider environment. Industry standards would dictate that Gunlake should be making a similar investment.

Holcim, Lynwood Quarry is only 500 metres from the Gunlake Quarry. Holcim ships all its product to Sydney by rail. Gunlake must be required to do the same.

Failure to Comply with SEARs

Gunlake were required to provide;

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 from the E.I.S. that Gunlake have failed this requirement. They have offered 7 options. Only one is a pure rail option, but chooses to duplicate the existing rail infrastructure at Holcim instead of exploring options to “use existing rail infrastructure at the Lynwood Quarry.” In fact the Gunlake E.I.S. makes it quite clear that Gunlake have not even spoken to Holcim about such an option.

Noise

The Gunlake E.I.S. acknowledges there will be significant noise impacts on neighbouring properties. Gunlake however proposes “receiver based” noise mitigation measures – presumably double glazing or even increased sound insulation, upon request and determination by Gunlake if it is warranted.

It is clearly quite ludicrous to suggest receiver point noise mitigation instead of source based sound mitigation. Even if Gunlake agreed to provide mitigation and even if it was effective, it would mean

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the home owner would now have to stay inside their home to get any benefit from such mitigation measures. This is a rural environment. People have bought their properties and built quite substantial homes in order to enjoy the peace, tranquillity and solitude of the pristine rural environment. Many people, my family included, are building significant gardens and surrounds at their properties. People expect, and should have, a right of quiet enjoyment of their properties and homes.

My family and I live some 7-8 kms from Gunlake and when a light breeze is blowing in our direction, the sound of Gunlake's crushing equipment is quite invasive and disturbing. That sound 24 hours a day, as is proposed by Gunlake, would be intolerable.

At a public meeting, over 12 months ago, Ed O'Neil CEO of Gunlake, advised the community that he would provide a sound proof shed to enclose all crushing operations. That has failed to materialise, and the E.I.S. make no reference to such an enclosure.

Gunlake have since refused to conduct any further public consultation.

The solution

Again, Holcim provide the model.

Holcim have built a sound proof shed over their crushing equipment. It suppresses all sound from the crushing process. I have on several occasions stood in the car park at Holcim, perhaps 200 metres from the enclosed crushers whilst they have been operating. I could not hear any noise from the crushers at all.

Again, Gunlake must be required to adhere to the same standards adopted by Holcim.

Submission

Until, the above matters have been full addressed, I submit the present proposal by Gunlake be rejected.

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