

## RESPONSE TO DEP REGARDING PROPOSED EXPANSION OF GUNLAKE QUARRY.

I am [REDACTED] an engineer/businessman and at one stage state manager for quarries for Pioneer Concrete (now Hanson). There are a range of concerns which I will address briefly in point form including truck traffic; noise and general amenity.

### a) TRUCK TRAFFIC

Gunlake was requested to examine alternatives to Brayton Road by rail or truck. Firstly their evaluation of rail vs road was simplistically based on a narrow benefit/cost analysis at the transport level. The benefits did not include any external benefits such as benefits to other users and neighbours by getting trucks off Brayton Rad; reduced accidents ; reduced maintenance costs to Hume Highway; reduced congestion; reduced air pollution etc..

The obvious question is not only why these benefits were not taken into account but why was the evaluation not done at the level of the overall expansion. The stated cost of the expansion is \$3.2million for an extra production of 1 250 000 tpa. Assuming a cash profit of at least \$5 per tonne this represents a 6 month investment payback – this is extraordinary! The discount rate used was 7% whereas there is an argument that with significantly decreasing interest rates (10 year swap rate is about 2.5%) the discount rate should be nearer 5%.

This adjustment of discount rate alone would turn the 0.86 type benefit cost analyses for rail vs road to be greater than unity ie should be done even according to Gunlakes's methodology. If the numerous other

benefits listed above were included it would also be positive. Finally if it was properly done at a project level it would be massively positive.

The conclusion is the approach to determining rail vs road or Brayton Road vs other road options via Holcim using a narrow benefit/cost analysis is fundamentally flawed.

The other point to note is Gunlake have not approached Holcim to see if any of these options are feasible to do jointly and reduce costs. I was one of the original directors of the Penrith Lakes Scheme in 1983 which involved ground breaking cooperation between the major quarry companies. There is no obvious reason why it should not occur here.

#### b) NOISE

The crushers should be enclosed to reduce noise. This is normal practice in modern quarry developments and is very effective. An inspection of Holcim's Lynwood Quarry or Boral's Peppertree will confirm this. There are a number of other noise mitigants that involve cost but can be effective.

#### c) SAFETY

There is no adequate audit of the safety of Brayton Road for large truck volumes. This is not just about lane widths. It is about shoulder width; curve radius; sight lines; speed limits; gradients etc.. The RMS or an independent engineer should examine this.

It is noted Gunlake see cyclists and pedestrians as unlikely therefore ignored – collateral damage. I have news for them people would cycle

and walk along Brayton Road but that is not possible with 40 tonne trucks speeding past every minute!

Also the merge lane at the Hume Highway for Red Hills Road is dangerous and should not be delayed until 2025 as Gunlake propose.

#### d) CONSULTATION

It is noted there has been only one community meeting in July 2015. Apparently there was a fact sheet distributed last August but nobody I know in Brayton Road got one. This is beyond “minimalist “ community consultation.

#### e) ERRORS AND CLARIFICATIONS

Firstly it appears the application is for 24 hour operations 6 days a week. So why does Table 3.3 show quarrying and processing being 7am to 6pm Monday to Saturday??

Secondly Goulburn Mulwaree Council in a Report from Officers dated 17 November 2015 assessed the required Sectn 94 contribution to be 4.6 cents/tonne/per km. This would cover annual maintenance estimated at \$9000 per km or \$63 000 per year

for the length of Brayton Road and the Bypass Road as well as periodic rebuilds. Whereas Gunlake state their Sectn 94 contribution is only 3.1 cents/tonne/km and their estimate of annual maintenance is \$5000 – refer Table E3 and Table 10.10.

Maybe there is a simple explanation but these apparent errors diminish confidence in this EIS. Overall it is a self serving document which takes

little account of neighbours or the broader NSW community. It just focuses on profit and it is very profitable!!

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