

## GUNLAKE QUARRIES – CONTINUATION PROJECT

We are residents of Brayton Road, Brayton with our residence located approx 100m from the road and our road frontage extending for approx 1.3kms along the Primary Transport Route. The Gunlake Quarries Continuation Project is seeking an increase in the fixed annual tonnage limit to 4.2 mtpa, increase the daily truck movements from a maximum of 245 inbound and 245 outbound movements to 375 inbound and 375 outbound movements and extend the approval for quarry operations for 30 years to (circa) 2051.

We wish to lodge an objection to the Gunlake Quarries Continuation Project application based on the impacts of **traffic and transport, operational noise and blasting, air quality**, and the **adverse social impacts** the project would have on the surrounding community. We also believe that Gunlake Quarries has submitted an **incomplete EIS** based on the fact that data being used is outdated, ie there is much reliance on data generated in 2016. There is also a lack of real time data obtained to assess the impact that expansion of Gunlake Quarries operations would have on the rapid growth of Marulan residential subdivisions. The following is submitted in support of our objections.

### 1. Cumulative Traffic Impacts

We object to the justification for this application to increase the maximum daily truck movements along the Primary Transport Route in order to facilitate the movement of additional saleable product.

According to the EMM **Traffic Impact Assessment** (Appendix F.1, 5.2.1 Local Quarries), the cumulative traffic impacts of the proposed modification have been assessed considering five other quarries/mines in the broader locality (Table 5.1, page 35):

- Marulan South Limestone Mine;
- Peppertree Quarry;
- Ardmore Park Quarry;
- Lynwood Quarry; and
- Johnniefields Quarry.

The list of quarries/mines above is incorrect as Johnniefields is no longer operational due to Holcim having surrendered their EPA license number 1371 to the EPA on 23 October 2020, and therefore is no longer relevant to current cumulative traffic impacts. This license surrender is in accordance with the Conditions of Consent for Lynwood Quarry.

The total truck movements taken from data listed in the EMM Table 5.1 differ somewhat if actual maximum numbers that each extractive industry could generate is applied. As you will see from the table below, based Gunlake's current approval of **245** truck movements inbound and **245** outbound, the total four (4) local quarries only exceed Gunlake by **4,574** movements, (ie **145,694 minus 141,120**):

Quarry/Mine	Approved/current tonnage per annum	Table 5.1 data – Annual truck movements	Gunlake Quarry (based on 245 inbound and 245 outbound)
Marulan South Limestone Mine	330,000	16,718	
Peppertree Quarry	-	1,460	
Ardmore Park (Multiquip) Quarry	-	36,608	
Lynwood Quarry	1.5mtpa	90,908	
Johnniefields Quarry	-	-	
<b>Totals</b>		<b>145,694</b>	<b>141,120</b>

However, Marulan South Limestone Quarry Continuation Project is seeking to increase transport by road to 600,000 tpa and Gunlake Quarries is proposing to increase truck movements to 375 inbound and 375 outbound per day in this application. Comparison truck movements between four (4) of the above local quarries/mine and Gunlake Quarries, including proposed increases, appear in the tables below, *Comparison Truck Movements*. The traffic generation for these quarries has been assumed that any current development applications, such as for the Marulan South Limestone Mine Continuation Project, will be approved and each quarry is operating at full capacity.

The table below, *Comparison Truck Movements - v.1*, reflects comparison total truck movements of the four (4) local quarries with Gunlake Quarries proposed increase to 375 inbound and 375 outbound.

**Comparison truck movements – v1**

Quarry/Mine	Total truck movements incl Marulan South Continuation Project proposed increase to 600,000 tpa (avg 33t)	Total truck movements - Gunlake Quarries proposed increase to 375 inbound and 375 outbound
Marulan South Limestone Mine	36,364	
Peppertree Quarry	1,460	
Ardmore Park (Multiquip) Quarry	36,608	
Lynwood Quarry	90,908	
<b>Totals</b>	<b>165,340</b>	<b>216,000</b>

However, in table *Comparison Truck Movements – v.2* below, the figures indicate that Gunlake Quarries will **exceed** all four (4) quarries by a staggering **50,660** truck movements in total per annum.

**Comparison truck movements – v2**

Local quarries total truck movements incl Marulan South proposed increase to 600,000 tpa	Gunlake Quarries Continuation Project proposed increase to 375 inbound and 375 outbound	Difference between local quarries' total movements and Gunlake Quarries Continuation Project proposed increase
165,340	216,000	<b>50,660</b>

The above comparison of cumulative traffic impacts gives a clear indication that Gunlake Quarries will be contributing a greater impact than all four other local quarries put together.

The above figures cover truck movements of quarries currently operating in the area however recent correspondence received from yet another quarrying company, Cleary Bros, recognises how much of a focal point Marulan has become for the quarrying industry. Cleary Bros advise they are considering their options in establishing to the west of the town however there is no detail as to where exactly they are carrying out their investigations. We believe transportation of materials by road has already reached saturation point and once again opens the debate on rail being a valid and necessary option.

## 2. Transport Options Review

LEC 2017/108663, Schedule 3, Environmental Performance Conditions, Condition 29(c), Transport Options Review, states:

*“review the economic, social and environmental costs and benefits of all reasonable and feasible options for the transport of quarry products from the site (including rail and including truck movements currently permitted by this consent).”*

The *Gunlake Quarries Rail Transport Study (Hatch 2016)*, prepared concept and feasibility designs and operating costs of road only and road/rail options for the transport of product from Gunlake Quarries to Sydney. This included rail/road options, made up of combinations as follows:

- three options for train loading: at Gunlake Quarry, within Lynwood Quarry and at a new siding adjacent to the Main Southern Railway line west of Lynwood Quarry;
- two train unloading options at Glendenning;
- three train unloading options at Smeaton Grange; and
- one train unloading option at Silverwater.”

Extracted from the Hatch (2016) analysis are the findings, including capital and operating costs, in summary:

- the base case (the primary transport route) has the lowest capital cost: \$1.5 million;
- Option 2 (road-only - private haul road from Gunlake Quarry through Lynwood Quarry, east of the approved granite pit, to Marulan South Interchange): \$35 million; and
- Options 11–13 (road/rail - private haul road to a rail loading facility on a new rail siding west of Lynwood Quarry, rail transport to a rail unloading facility at Smeaton Grange and distribution by truck to (concrete batching plants -CBPs): \$70–\$75 million.”

As of 2016, it was estimated that Gunlake had invested about \$30 million into the quarry, including \$3.3 million on local roads, and would invest \$1.5 million to construct the (now completed) acceleration lane on the Hume Highway, and \$0.4 million on additional road improvements. It was concluded that there were no economically viable rail or private haul road options and that the quarry could only proceed with transportation via the primary and secondary transport routes.

All the above costs may not seem of economic benefit to Gunlake Quarries, however they are, all the same, necessary costs in order to run a socially and environmentally responsible extractive industry. The investment made by Gunlake Quarries is substantially lower by several hundreds of million dollars than the initial outlay made by Holcim’s Lynwood and Boral’s Peppertree quarries, each of which are approved to transport 3.5mtpa by rail. Gunlake is moving towards the same annual tonnage with 2.6mtpa already approved and potentially 4.2mtpa should the Continuation Project be approved.

Further, according to the Hatch analysis, the road/rail option (options 11-13 above) would add an estimated \$125 million to the present base cost by road only, (page 85, Figure 7.4 of 005 – App D). However, this is calculated over a period of 30 years of operation and equates to a relatively low expense of around \$4m per year. During this time, Gunlake Quarries stands to grow from a multi million dollar operation to, potentially, a multi billion dollar enterprise. To reject rail options solely based on reduced net profit, in our view, is unacceptable.

Given the conditions placed on the approval of both Lynwood and Peppertree quarries, where 3.5mtpa **MUST** be transported by rail, to allow Gunlake less restrictions for greater gain as a result of lower overheads, does not appear to be a level playing field and could create division amongst the industry.

## **Second Quarry and Inland Rail Option**

We believe one option that appears to have been overlooked to date is exploration of a new, second quarry located along the inland rail route. The inland rail is a \$9.3 billion investment made by the Federal Government to encourage road freight onto rail and its potential to reduce carbon emissions and costs of transportation by rail for Gunlake should not be underestimated.

This option should not be considered unreasonable as it is not unusual for the extractive industry to have more than one quarry located where their markets lie. As an estimated 70% of product is transported to Sydney and the majority of Gunlake concrete batching plants lie on the outer fringes of Greater Western Sydney, transportation of product via the inland rail to the Parkes Logistics Terminal (see photo below), then into Sydney via the East-West rail line would reduce the number of truck movements substantially, ***potentially taking more than 4.5 million truck movements off the roads over a 30-year period.*** It would also seem to be a better option than the main southern line which is already being utilised by both Lynwood and Peppertree quarries, and where gaining slots would be more problematic. (See link to ARTC website below).

<https://inlandrail.artc.com.au/what-is-inland-rail/benefits/>



**Parkes Logistics Terminal** – “The opening of the \$35 million Parkes Logistics Terminal is set increase productivity on the Inland Rail project and make Parkes an epicentre of regional growth”. – Infrastructure Magazine, 1 November 2019.

Not only would this be a safer and cleaner option due to reduced greenhouse gas emissions (i.e. rail vs road), but would allow the present Gunlake owned quarry resources to be preserved to meet the future growth and housing needs in the Southern Highlands/Tablelands region, particularly Goulburn and Marulan, as outlined in the Goulburn Mulwaree Council Urban Fringe and Housing Strategy (UFHS).

The UFHS looks into the potential growth of the Goulburn Mulwaree region towards 2036. From the initial proposal, Gunlake Quarries had an estimated resource of 180 million tonnes of aggregate, enough to sustain 90 years of extraction. Should the proposal to increase to 375 movements inbound and 375 outbound be approved, this resource would potentially be exhausted by around 2051, the year Gunlake is seeking to extend the life of their quarry operations. If Gunlake was to continue in this vein, the need to expand their footprint would be inevitable, creating further disturbance to, and losses within this incredibly fragile environment, home to many endangered species of flora and fauna. It would also make no sense to have to import resources from outside the region during the expected period of growth in Marulan when it is already 'on our doorstep'.

The argument for the tonnage limit of Gunlake Quarry to remain at no more than 2.6mtpa cannot be ignored and the impacts of any increase should be thoroughly investigated.

### 3. Road Traffic Noise Assessment

Road traffic noise monitoring was undertaken by EMM in November 2020, (Road Traffic Noise Impact Assessment, 008, App G). The 'Road Traffic Noise Compliance Survey', states that noise monitoring was carried out in August 2020 at two locations on the Primary Transport Route, namely RT1 and RT2 (Figure 4.1), and were identified as '*representative of the nearest, potentially affected receptors*'. (Item 4, page 5).

Results of an additional road traffic noise monitoring undertaken by EMM in November 2020, some 3 months later, identified that '*the nearest residential facades potentially affected by the proposed increase in traffic are located on Brayton Road (west of Ambrose/Red Hills Road) and on Ambrose/Red Hills Road*'. On close inspection of **Figure 4.1 – Road traffic noise monitoring and assessment locations** of the *Road Traffic Noise Impact Assessment* dated 12 November 2020, (008, App G), it appears that RT1 is a Gunlake-owned property/residence located 185m from a stretch of road that has little or no damage on the road surface. See photo #1 below.



**Photo #1. Approximate location of RT1 traffic noise assessment on a stretch of minimally damaged road.**

RT2 is a short distance from the Brayton Road/Ambrose Road intersection and is Gunlake-owned, purchased in 2008. Identified as 52 Jaorimin Creek Road, the block houses a caravan with a few outbuildings and was only used as a holiday retreat by two previous owners. It is unknown whether or not this structure is occupied at present, either permanently or casually.





**Photo #2 RT2 – Gunlake-owned block with distant view of caravan through trees to the RHS of photo, located at 52 Jaorimin Creek Road, off Ambrose Road.**



**Photo #3 RT2 – Gunlake-owned block with closer distant view of caravan located at 52 Jaorimin Creek Road, off Ambrose Road.**

According to the EMM assessment, the road traffic noise levels measured at this location were used to calculate those ***at the most affected residence on this section of Brayton Road***".

We believe our residence is that identified as 'the most affected residence' in Table 4.1 – *Road Traffic Noise Results, (page 5)*. In this table, the distance to the nearest receiver is 108m, which correlates with our residence.

We are aware of noise monitoring being conducted at the top of our driveway in late 2020, but interestingly it has neither been taken into account nor reported on in this assessment. Nor, it appears have any other noise monitoring results taken between RT1 and RT2 been provided in the assessment. Instead, the conclusion to the EMM Road Traffic Noise Impact Assessment relies on predictions based on the monitoring conducted at these two locations alone. *“This road traffic noise impact assessment considers the proposed increase in daily truck movements along the Quarry’s Primary Transport Route. Road traffic noise levels have been predicted based on the results of road traffic noise compliance monitoring in August 2020 (EMM 2020).*

In addition to this, reference notes below Table 4.1 – Road traffic noise results – page 5, Traffic Noise Compliance Assessment (010-App I) indicates that the results have relied on noise levels taken in 2015, as follows:

*Notes: 1. Referenced from the NVA (EMM 2016). Based on road traffic noise levels measured in 2015 from approved quarry truck movements prior to the extension project and other non-Gunlake traffic movements.*

*2. Logarithmic sum of road traffic noise levels from existing road traffic and extension project trucks movements.*

It is our opinion that, due to the lack of recent results being furnished within the noise impact assessments, the levels have already exceeded the relevant criteria. Without evidence of these results being produced and reliance on predictions when actual readings are available, leaves a lot open to question and needs to be investigated.

In addition to no real time data being supplied, there is also an admission that a residential subdivision has not been taken into account as follows:

*“There is a residential subdivision currently under construction located between assessment locations R14 and R15 (off Corriedale Drive and adjacent to Brayton Road). At the time of preparing this report, no residential dwellings had been completed on any of the lots within the subdivision and therefore have not been included as assessment locations. However, potential impacts at the future residences would be comparable to assessment locations R14 and R15”. (Noise Impact assessment, App F.3, Table 2, page 10 and Figure 2.3, page 11).*

The residential subdivision mentioned above **fronts the Primary Haulage Route for approx. 800m** and is located in close proximity to a narrow bridge and the Ambrose/Brayton Roads intersection. Along this stretch of road, trucks begin to decelerate into, and accelerate out of, each location. As can be seen, the lots are open-spaced and more likely to be impacted by traffic noise than that of R14 and R15. (See photos #4 to # 9 below).



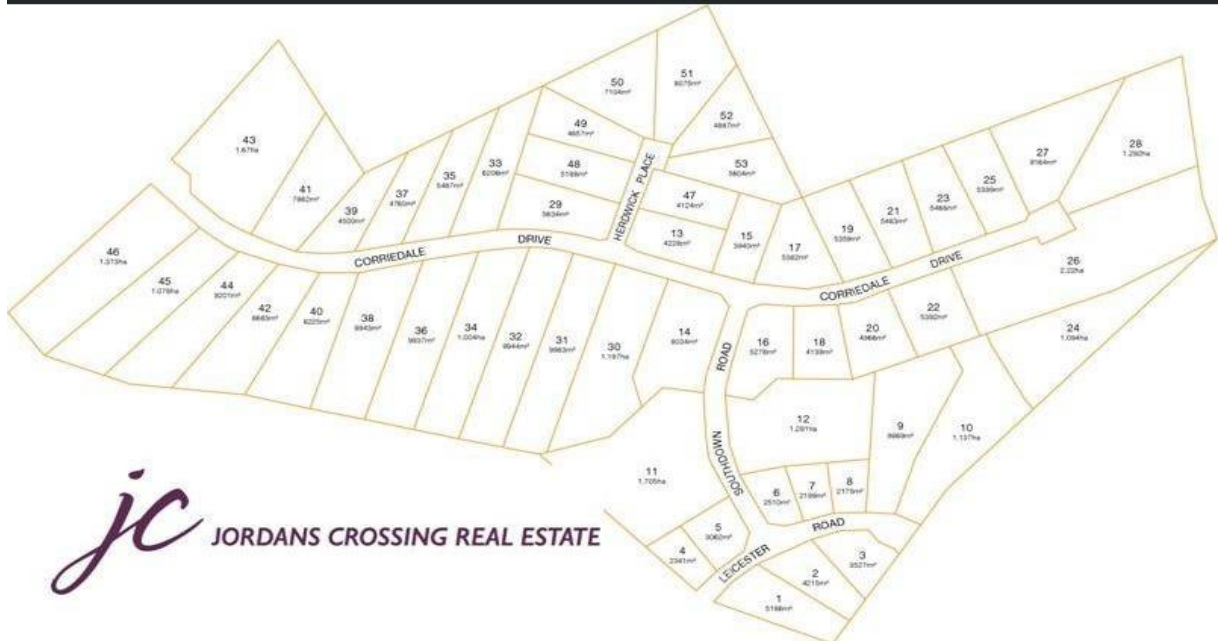


Photo #4 – Residential 53 lot subdivision fronting Brayton Road.



Photo #5 – Residential 53 lot subdivision fronting Brayton Road – aerial view.





Photos #6 and #7 – Houses under construction Corriedale Road\_16Oct21



Photo #8 – Houses completed and occupied  
- view from Brayton Road.

Photo #9 – Narrow bridge – Brayton Road

The township of Marulan now extends to R15 which is located at 275 Brayton Road, and as far as R14, which is located at 353 Brayton Road Marulan. This places the entire subdivision of some **53 lots, (most of which are sold, with several houses already completed and occupied or under construction)**, as well as the existing subdivisions to the north of Merino Road, within a 5km radius of the Gunlake operations. The area we have highlighted in green on Fig 3.1 (Appendix B) outlines the extent of housing excluded from the Traffic Noise Assessment and, in our opinion, renders it **incomplete**.

#### 4. Road Safety

We strongly dispute the EMM assessment that Brayton Road is in excellent condition nor is Ambrose Road in good condition and believe that significant repairs and further upgrades are required for both. We also reject the Australian Road Research Board (ARRB) assessment that the *‘the impact on road safety for all road users is considered to be negligible’*. The report, (App F.2), co-authored by David McTiernan of the ARRB, cannot be considered truly independent in assessing the state of the roads as they have been engaged to consult on this matter for previous Gunlake Quarries applications and modifications. We believe greater credence would have been given to a report compiled by a consultancy that had no prior connections.

We do accept the recommendations made by Goulburn Mulwaree Council and the Transport for NSW contributions the SEARs for the Continuation Project as being necessary for the current approval and essential for any further modifications to the Gunlake operations.

Due to the volume of documentary and photographic evidence we wish to provide in order to support our own opinion on, and evaluation of the **road safety issues**, please refer to **ATTACHMENT A** of our submission.

#### 5. Air Quality

There has been no monitoring or collection of data in relation to dust deposition or blasting on our property. We are located less than 2kms to the south-east of the Gunlake Quarry pit and as the Continuation Project is seeking to expand the pit into their existing footprint in the direction of our residence, we believe we will be subjected to increased levels of dust depositions, including a cumulative impact from Holcim Lynwood Quarry operations. (See App B - Detailed Maps and Plans).

Our residence is directly opposite properties identified as sensitive receptive locations yet we have not been included in any Air Quality assessments. Over the proposed life of the quarry, operations will progressively approach the boundary of our property and residence, with the potential for particulate matter pollutants to increase over time. We therefore believe that the Air Quality Assessment, App F.4, is **incomplete**.

#### 6. Greenhouse Gas Assessment

App F.4 – Air Quality Impact Assessment calculates the Greenhouse Gas assessments for the continuation Project to be as follows:

Diesel used for onsite operations	<b>2,700,000 litres</b>
Diesel used for product transportation – Gunlake-owned trucks	<b>900,000 litres</b>
Diesel used for product transportation – third party trucks	<b>17,913,100 litres</b>
Employee travel petrol consumption	<b>102,600 litres</b>
Electricity (kWh)	<b>10,800,000 kwh</b>

The assessment concludes that the estimated Greenhouse Gas emissions for the Continuation Project to be **22,506 tonnes of CO<sub>2</sub> emissions/year**

We do not purport to be air quality experts however you cannot ignore the science. Given the Australian Government’s recent stand on cutting emissions, it would be remiss of any State Government Department to not heed the conclusions of **global experts** but rather to contribute to Australia’s reduction schemes whenever and wherever possible.

The argument for taking more trucks off the road and onto rail supports our suggestion that the inland rail option should be explored. It certainly won't solve Australia's level of emissions but it would certainly be a start and could result in likewise considerations in the future.

## **7. Community Consultation**

A Community Information Session for the Continuation Project planned to be held at the Marulan Hall on Friday 27 August 2021 was cancelled due to the regional NSW lockdown at the time. Since then, no further community consultation has taken place other than another newsletter dated October 2021 providing an overview of the Gunlake Quarry Continuation Project.

As previously mentioned, Marulan is presently experiencing a rapid population growth, particularly north of Marulan in the Betley Park Estate. We are concerned that there has not been enough consultation within the community for those who may be directly affected by the application, ie. those currently living, as well as those soon to be living within a 5km radius of the Gunlake Quarry operations. There has been adequate time to reschedule another face-to-face information session, yet has not been forthcoming. Until such time as Gunlake can guarantee that all interested parties have been sufficiently informed on the impacts they may experience now or in the future, then Community Consultation has not been appropriately or accordingly addressed.

Information Sessions go a long way to ensuring members of the community can make informed opinions and decisions on how major developments can or will affect them, either directly or indirectly. We believe that when the last information session was held in December 2020 for the Gunlake Quarry Trucking Increase application, it is possible that only a few people attended because there is a long-held belief by some that these applications are already a 'done deal'. Then again, perhaps there was more to it, possibly COVID-19 restrictions, or it may well have been a case of **'battle fatigue'** from the continual stream of applications and modifications since 2006, ie eight (8) in total so far, which can take months, or sometimes years, to determine. A lot of time and energy needs to be devoted on each occasion and the question of whether or not these incremental expansions are truly necessary or were a planned and calculated exercise of growth by stealth from instigation. The increase in trucking movements application is a prime example of what we mean. Before the application was even been lodged with the Court, the next phase, this Continuation Project, was already underway. It is as if, as each new application is approved irrespective of any genuine or demonstrated need, the next will be an easier case to argue if presented as just a 'few more trucks'.

In other words, a quantum leap from 1mtpa to 4.2mtpa would likely receive many more objections and come under much more scrutiny than undertaking a step-by-step approach over a period of time. For the likes of us who have been around since the onset of Gunlake's operations, we find no comfort when reading assessments made by consultants in favour of the applications, who happily rely on modelling and limitations determined by each of the relevant organisations and agencies, when the actual experience is far from acceptable, tolerable, or something that **'you will get used to'**.

## **8. Social Impact**

There has been much discussion how community-minded Gunlake Quarries is, including their contribution to the Marulan local economy and support for Marulan local events, however none of these compare to the influence and effect they have on the loss of community in Brayton.



As with all developments there are winners and losers. A recent comment by a Marulan towns person on the 'nice new road we have' is a typical misconception of the benefits the quarry brings to the community. We have gained nothing by the Gunlake Quarries operation yet we have lost much – not only loss of amenity, hopes and aspirations for our future, but a loss of community.

Before Gunlake Quarries MP07/0074 was approved in 2008, the Brayton community was on the increase, with homes being built and families moving into the area. In the past twelve or so years, several permanent residents have sold up and moved on largely due to the impacts of traffic, noise and dust from the quarries, in particular, Gunlake Quarries. In the wake of this exodus of permanent residents, Brayton has been relegated to a community of second homes/weekenders that are rarely visited or Gunlake-owned properties purchased under the Voluntary Land Acquisition and Mitigation Policy (VLAMP) and rented out to person/s who agree to live under such adverse conditions. There appears to be only a few permanent resident households left along the Brayton Road section of the Primary Haulage Route now.

Whenever genuine complaints surrounding loss of amenity are raised in submissions by affected residents, the immediate response from consultants is the increase in social benefits for the community, for example, more jobs, support of local businesses, increase in the local economy. How can this relate to the Marulan community when the average return trip for employees is 69.1kms (Marulan is only 7kms from the quarry site). In addition to this, most of the truck drivers are contractors from Sydney and are required to by-pass the village via Ambrose Road, inbound and outbound, and would more than likely support their own local businesses. Apart from the minority, Marulan-based employees, the Gunlake pay-packets would be largely spent outside of the region, in which case, the social benefits are far outweighed by negative aspects.

Marulan is growing at a rapid pace as can be verified by the number of lots sold within the town and on its outskirts. Until the latest census results are publicised, little is known as to the actual demographics of the newcomers to Marulan, however it would be safe to say that many are from Greater Sydney looking for a 'tree change', or a better lifestyle to bring up their young families. Imagine the disappointment of building your dream home only to find that you are subjected to just as much traffic noise from the quarry trucks, day and night, as you might have been living on any arterial road in the city. Health authorities recognise that noise pollution can pose a general public health risk but certain groups of people who are habitually exposed, such as shift-workers, the elderly, infants and children, may face even greater risks.

To have overlooked the new residential subdivision within the Betley Park Estate fronting the Primary Haulage Route is reprehensible. There is no doubt that there will be children of all ages living in these homes who will be affected by the adverse impacts of the increase in truck movements. It is well documented that environmental noise and particulate matter pollutants from diesel fumes are adverse effects that traffic can have on young people. Noise exposure causing sleep disturbance could affect their behaviour, performance, cognitive development and learning as well as lead to health issues in later life. In our opinion, the social impact assessment of the Continuation Project is **incomplete**.

## **9. JUSTIFICATION**

The justification for this Continuation Project is reported to be due to an increasing demand for construction materials in both Greater Sydney and local regional markets. Although there may be much in the way of infrastructure programs being implemented by the State and Federal Governments, they are for the larger part in Greater Sydney, as outlined in the range of strategies and plans listed below:

- Local Strategic Planning Statement (Goulburn Mulwaree Council 2020);
- Western Sydney Aerotropolis Plan (Western Sydney Planning Partnership 2020);
- Greater Sydney Region Plan – A Metropolis of Three Cities (Greater Sydney Commission 2018);
- Building Momentum – State Infrastructure Strategy 2018–2038 (Infrastructure NSW 2018);
- Future Transport 2056 Strategy (Transport for NSW 2018);
- A 20-Year Economic Vision for Regional NSW 2018–2038 (NSW Government 2018);
- Greater Sydney Services and Infrastructure Plan (Transport for NSW 2018);
- Regional NSW Services and Infrastructure Plan (Transport for NSW 2018);
- South East and Tablelands Regional Plan 2036 (Department of Planning and Environment 2017);
- Barton Highway Improvement Strategy (Roads and Maritime Services 2017);
- Tablelands Regional Community Strategic Plan 2016–2036 (Cardno 2016); and
- Sydney to Canberra Corridor Regional Strategy (Department of Planning 2008).

According to the list above, by comparison, there are fewer opportunities south of the quarry available for Gunlake, particularly given the average daily limitation of 25 truck movements on the Secondary Haulage Route.

What we have noticed over time is that the majority of haulage companies that transport product from Gunlake Quarries are they themselves located within the Greater Sydney area, such as:

- Bringelly;
- Lucas Heights;
- Matraville;
- Menangle;
- Minchinbury;
- Prestons;
- South Maroota (Pitt Town)
- Spring Farm; and
- Smeaton Grange.

What justification is there to make several round trips a day, of roughly 320kms each time, and then make a delivery within Greater Sydney itself, sometimes, or even often, by-passing the site en-route to Marulan?

## **10. ECONOMIC ASSESSMENT**

The Economic Assessment compiled by Gillespie Economics states that the Secretary's Environmental Assessment Requirements (SEARs) for the Continuation Project require -

*"a detailed assessment of the likely economic impacts of the development, paying particular attention to:*

- *the significance of the resource;*

The significance of this resource from the Devonian Bindook Volcanic Complex is not under question here but rather should Marulan continue to be exploited for this hard rock. Marulan has become a focal point for this resource to the extent that yet another extractive industry, Cleary Bros, is considering its options in the area. (See Appendix A). Marulan lies within the Lachlan Fold Belt and although the resource found here is well sought after, could rock be found elsewhere along the north-eastern belt that would suffice for the many and varied aspects of construction. Is it really necessary to supply such premium aggregates for every purpose when potential sites more accessible to Greater Sydney **by rail** could be explored for resources albeit of lesser significance however may be in greater abundance?

- *the costs and benefits of the project; identifying whether the development as a whole would result in a net benefit to NSW, including consideration of fluctuation in commodity markets and exchange rates;*

In our opinion, the Cost Benefits Analysis (CBA) reads more like a commercial marketing assignment for a business preparing itself for sale. As per the Gunlake Group webpage, historically, this has been a Company trend of the O'Neil family in the past. Perhaps this is an option Gunlake is considering?

According to a statement from the CBA below, there appears to be no economic benefits to existing landlords which leads us to believe there are not only **no benefits** but rather an immeasurable cost to all those affected by Gunlake operations -

***"Economic Benefits to Existing Landholders***

*All land required for the Continuation Project is owned by the proponent. No benefits to other landholders via land prices in excess of the opportunity cost of the land will occur."*

The 'Cost of Development' for the Continuation Project has been confirmed by Quantity Surveyors as being **\$315,544 (incl GST)**. This costing represents the installation of an additional weighbridge and **repairs/reseal of the internal access road of the quarry**.

Installation of an additional weighbridge would definitely be considered capital expenditure however not so resealing of the internal haulage route, which would you expect to come under repairs and maintenance. The fact that the quantity surveyors have not itemised the cost of each expense for the Continuation Project leads us to believe that the actual 'Cost of Development' is far less than what is being portrayed.

On the other hand, considering the investment made by landholders of the residential subdivision fronting the Primary Haulage Route being **between \$420,000 and \$580,000** just for a block of land, the outlay of Gunlake Quarries for the rewards this project will bring, is **minimal by comparison**.

- *the demand on local infrastructure and services."*

The main potential impact relates to the use of local road infrastructure which we have covered extensively elsewhere in our submission.

## **11. Conclusion**

Although the effects of traffic, noise and road safety are clearly evident and can be proven, it appears many of the assessments associated with this application have had information falsely represented, including real time data being withheld so that the true adverse impacts on the community, notwithstanding those which apply to ourselves, are not disclosed.

Not everyone is in a position to apply for, or accept, a VLAMP. Not everyone is willing to give up or sell what they have worked hard to achieve, for any number of reasons, and ought not to be placed in a position where they feel they are being forced from their homes in order for one business to continue to build their empire. Competition is good and to have independent opposition to multi-national companies is necessary but not at the expense and needless angst of others who are unlucky enough to live in the firing line.

Our intention is not to see Gunlake Quarries cease operations but we strongly believe that they cannot rely on the benefits to the wider community of Sydney to be at the expense of the wider community of Marulan, particularly from, but not limited to, a health and well-being perspective. In our opinion, the handful of jobs on offer from the Continuation Project could



be easily created within Marulan itself if allowed to progress in more diverse directions, not only through the extractive industry.

We therefore respectfully request that the Department accepts our objections to the Gunlake Quarries Continuation Project and recommends that the application be **REJECTED**.

## APPENDIX A



07 September 2021

Neighbours and Residents  
MARULAN NSW 2579  
Dear Neighbour,

We're writing today to introduce ourselves to you and the wider Marulan community.

Cleary Bros is an Australian family-owned Company that has been at the frontline of shaping the Illawarra and South Coast for more than a century. Through our range of building and construction products and solutions, we've assisted the region to grow by directly contributing to the public and private infrastructure upon which we all rely. For many years, we have supported local sporting, charitable and other activities to give back to the community of which the Cleary family and our employees form part.

The 300+ mainly local resident employees of our business support this need through our integrated portfolio of services. These include the production and supply of hard rock quarry aggregates, sand, pre-mixed concrete, construction and logistics management, and heavy earthmoving equipment hire.

While we're a familiar and proud part of our communities on the coast, we've recently been presented with an opportunity to consider establishing in the Marulan region. As part of further investigating our options, we would like to request your input to better understand the area and its needs.

During the past decade, Marulan has become a focal point for the extractive (quarrying) industry, with several major developments to both the east and west of the town. These new and expanded operations have brought with them degrees of change to the physical, social and economic life of Marulan.

Given our strong commitment to the communities in which we presently operate, we'd like to develop an early perspective on how these changes have been received locally. We'd like to hear, in your words, about what you believe have been the benefits and perhaps the less desirable outcomes of the sector's growth.

If you're interested, we've created a simple online survey which can be accessed by the QR code below through which you can provide your views. We'd like to assure you that any information provided will be kept in confidence and used only to help us identify community priorities and concerns in progressing our opportunities.

We'd appreciate any feedback you'd like to offer by **30 September 2021**. Once we've analysed the results and explored our options further, we'll then come back to the community with further details about how we propose to become more involved in Marulan.

In "ordinary" times, we would have made both this introduction and request in person. We apologise we're not able to do this right now however once current restrictions are eased and we can move freely again, rest assured we're looking forward to meeting with you all. If you would like to organise a virtual meeting with me to discuss any of the above, please do not hesitate to contact me on my mobile or by email (my contact details are below).

Thank you for considering our letter and for any information and advice you provide through to us. We encourage you to visit our website, [www.clearybros.com.au](http://www.clearybros.com.au), to learn more about who we are and how we're working toward building better communities.

Yours faithfully  
**CLEARY BROS (BOMBO) PTY LTD**

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## APPENDIX B

Primary Haulage Route with area of 53-lot new subdivision highlighted in green.

