



**econetwork**  
port stephens

PO Box 97

Nelson Bay. NSW 2017

20<sup>th</sup> July 2023

**Ref: Stone Ridge Quarry Project, Italia Road, Balickera, NSW 2324**

**SSD-10432, EPBC ID: 2022/09368, LOT: 1, DP 724372; LOT: 36 and 65, DP: 753200; LOT 540, DP: 1207159**

To the Director, Resource Assessments, Jessie Evans,

EcoNetwork-Port Stephens is a grassroots community-based environmental and sustainability network comprising 27 community and environment groups and eco-businesses with a focus on sustainable planning. We are non-party political and do not donate to political parties.

**EcoNetwork Port Stephens objects to the Stone Ridge Quarry proposal on the following grounds:**

1. Non-compliance with various government regulations and Acts including:

- **The EPBC Act Part 3, Division 1** controlled provisions are 'Listed threatened species and communities' (sections 18 & 18A).

ARDG's own assessment of Matters of National Environmental Significance (MNES) listed under the EPBC Act has identified that the project is likely to have a significant impact on the Koala due to the clearance of 79.02 ha of suitable koala habitat. Koalas, squirrel gliders, brush-tailed phascogales as well as threatened species of birds, bats, microbats and orchids have all been identified on or near the development site. Surveys for *Corybas dowlingii* and Powerful Owl breeding habitat have not been completed.

The disturbance site includes two **threatened ecological communities** (TEC) listed under the NSW Biodiversity Conservation Act 2016, and one **Nationally listed Endangered ecological community**: Subtropical eucalypt floodplain forest and woodland of the NSW North Coast and South East Queensland bioregions. The first and largest phase of clearance includes habitat clearance in each of the three **Threatened Ecological Communities** and areas where koalas were recorded during recent surveys.

- **The Hunter Regional Plan 2041** which covers the site of the proposed quarry, more specifically the area named the Hinterland District.

One of the planning priorities for the Hinterland district is to 'support the NSW Koala Strategy'. The quarry proposal does not support the NSW Koala Strategy which recognises that koalas in NSW may be extinct by 2050, predominantly due to habitat loss. The Stone Ridge Quarry Project will not only destroy koala habitat but will also jeopardise a pinch point connecting the Wallaroo State Forest with Wallaroo National Park and part of a regional fauna corridor with broader connection to the Karuah National Park, Medowie State Conservation Area, and Medowie Nature Reserve. (EIS BDAR, p. 39)

Objective 6 in the Hunter Regional Plan speaks of biodiversity conservation and habitat corridors:- *Large areas of remnant vegetation in the Hunter, such as national parks, state forests, council reserves, floodplains, foreshores and riparian vegetation, can be connected to secure biodiversity corridors.*

This statement is supportive of the retention of this important habitat corridor in the Wallaroo State Forest. It is not supportive of the pressure this potential pinch point would place on wildlife moving between the Wallaroo State Forest and the Wallaroo National Park and beyond.

- **The Forestry Act** defines multiple objectives for the Forestry Corporation NSW which each have equal weight, such that -

*.....where its activities affect the environment, to operate with the principles of ecologically sustainable development [eg, precautionary principle, intergenerational equity principle, conservation of biological diversity and ecological integrity, incorporating environmental factors into pricing and valuation, such as polluter pays, full environmental lifecycle costs etc.]*

and *.....to have regard for the community in which it operates.*

Forestry Corporations support for the Quarry Proposal is a direct contradiction of these objectives in its charter.

2. Sustainability: That there are alternate building materials available for road & other construction to that from rock quarries

The original ARDG proposal puts forward the argument that NSW is in dire need of the rock products to be produced at the Stone Ridge Quarry. (3.9 Project Need & Justification). These products include concrete, asphalt and sealing aggregates, gabion and crushed rock, armourstone and roadbase (Section 2.9.3)

The Stone Ridge EIS notes that the Hunter Regional Plan "specifically identifies the need for a reliable supply of construction materials to support this continued growth including sand and gravel, crushed rock, and aggregates." [EIS, sec 2.2, p11].

However, the full section of the Hunter Regional Plan reads: "NSW needs a reliable supply of construction materials to support continued growth. These include sand and gravel, crushed rock, **recycled materials and secondary aggregates created from construction, demolition and excavation.**" [my emphasis; Objective 9, Sustain and balance productive rural landscapes].

There are alternative materials to meet the strategic justification for the quarry which are treated equally under the Hunter Regional Plan.

Firstly, it has been estimated that the Hunter region alone has approximately 160-200 million tonnes of coal-ash waste at its disposal, presently contributing to ecosystem contamination, which could be reclaimed to manufacture sustainable, high-performing aggregates underpinning far greater potential regional employment benefits than the less than 50 direct jobs associated with the proposed Stone Ridge quarry proposal.

Secondly, the extensive amount of waste generated by various industries and human activities has made the disposal of solid waste a major problem around the world (Rahman et al., 2014a). In Australia, approximately 8.7 Mt of demolition concrete, 1.3 Mt of demolition brick, 3.3 Mt of waste excavation rock, 1.0 Mt of waste glass and 1.2 Mt of reclaimed asphalt pavements are stockpiled annually, and these stockpiles are growing (Clay et al., 2007, Sustainability Victoria, 2010).

Sustainability is no longer a buzz word but is being implemented in all government policies. The Victorian state government has implemented a zero-waste policy directive in which all wastes, regardless of quantity, should be diverted from landfill. Challenges of low-carbon economies and resource depletion are major factors in pushing toward reuse of C&D materials in roadwork applications (DSEWPC, 2012).

In addition, while the NSW Government doesn't appear to have a mandated policy for reuse of C&D materials, it does recognise the need for better management of waste on building sites with a paper, Minimising waste on the construction Site [WasteLearnGd1.docx \(live.com\)](#) proclaiming that *Sending building materials to landfill is like throwing money away*. The paper recognises that 40% of waste that goes to landfill is from construction sites.

Not only State Governments but researchers also recognise that roads and other constructions can be made from recycled materials. (See Appendix 1.)

### 3. The Environment

A state forest is not a suitable location for a quarry the size and scale of the proposed Stone Ridge Quarry. While the Forestry Act includes provisions for quarries to operate in state forests, the size and scale of the proposed Stone Ridge quarry goes far beyond the size of quarries historically authorised. (KKEPS, Koala Koalition EcoNetwork Port Stephens, has written extensively on this issue in their submission which is endorsed by EcoNetwork Port Stephens)

If approved, the proposed quarry will result in significant negative impacts to the natural environment. These include the permanent destruction of 79 ha of state forest held in trust for the public; a permanent loss of habitat and increased threats for local koalas and several other species of threatened wildlife; the significant degradation and narrowing of an existing broader habitat corridor in the region; and an expected degradation of important biological values of the adjacent Wallaroo National Park.

The following listed threatened species (NSW Biodiversity Conservation Act 2016) were noted during surveys:

- Rusty Greenhood (*Pterostylis chaetophora*)
- *Corybas dowlingii* (orchid)
- Squirrel Glider (*Petaurus norfolcensis*)
- Brush-tailed Phascogale (*Phascogale tapoatafa*)
- Koala (*Phascolarctos cinereus*)

- Potential calls of the Southern Myotis (*Myotis macropus*) were also recorded and the species is known to roost and breed in the Balickera Tunnel.
- Powerful Owl was heard but not seen.

**The proposed entry road cuts through this threatened forest, that significantly, was not burnt in the 2019-2020 bushfires.**

#### 4. Local Amenity

##### Road Safety

The proponent understands the impact of cumulative haulage trucks from at least 3 quarries using the same access point to the Pacific Highway/A1 Freeway and has stated that:

*ARDG has consulted closely with TfNSW regarding access to the Pacific Highway (refer Section 6.1.7). The project will not dispatch trucks to market until a suitable and safe access arrangement is in place. Access to the Pacific Highway for all trucks from the quarry would be in accordance with TfNSW requirements, which are currently being determined. (P 14 Section 3.6 Proposal)*

While the proponent will *....not dispatch trucks to market until a suitable and safe access arrangement is in place...* EcoNetwork PS suggests that a left turning merging lane out of Italia Road is not sufficient to allow for possibly 30 trucks per hour turning onto the Pacific Highway from at least 3 quarries in the area. (See Appendix 2, compiled by local community group, VoWW,Voices of Wallalong & Woodville)

Additionally, the construction of some type of interchange at Italia Road to allow quarry trucks to enter the Highway more safely, does nothing to alleviate the congestion that is already a problem at the Heatherbrae Roundabout and Hexham Bridge intersections.

The Seaham Boral Quarry and Brandy Hill Quarry are already in operation and trucks from these quarries turn left out of Italia Rd, drive down to the Karuah interchange where they are joined by trucks from Karuah East Quarry and several other quarries operating in the area, all driving south to Hexham and eventually the Central Coast or Sydney. Between Heatherbrae and Hexham, they are joined by sand trucks exiting Tomago Road and Old Punt Road from the 8 sand quarries along the coast, closer to Stockton and Williamtown.

An interchange at the immediate juncture of Italia Rd with the Pacific Highway may improve safety for vehicles entering and leaving the Highway, however the congestion problems further south as heavy vehicles navigate the Hexham Bridge and turn towards Sydney can only make an existing problem worse.

The dust and noise from blasting, then drilling, crushing, stockpiling and loading of trucks will travel over the local area making life miserable for local residents.

However, safety was the number one concern expressed by local residents in surveys conducted by the proponent. The approval of this quarry would enable a cluster of 5 other quarries currently in various stages of planning to progress, resulting in cumulative traffic, dust, noise and habitat loss impacts. Cumulative daily heavy truck haulage has been estimated to grow to well over 2000 per day should this approval be granted. Local residents have estimated that this will mean 30 heavy truck movements out of Italia Road and onto the highway every hour. (See Appendix 2)

Federal MP for Lyne, David Gillespie has expressed real concerns about road safety in the area of the Pacific Highway north of Raymond Terrace where quarry trucks enter the busy freeway.

Federal MP David Gillespie says plans for three large quarries north of Raymond Terrace demonstrate why the Pacific Highway urgently needs a new interchange to fix safety concerns at Italia Road, Medowie Road and the Bucketts Way. (Port Macquarie News, 27th June 2023. [Quarry plans revive calls for new overpass for Medowie Road, Italia Road, Bucketts Way | Port Macquarie News | Port Macquarie, NSW \(portnews.com.au\)](#))

*Two men died in a horror collision between a truck and a car on the Pacific Highway at Ferodale in 2019.*



*The M1 in this area around Raymond Terrace has been a bottleneck for years and now the State government has begun a project which will deliver a 15-kilometre extension of the M1 Pacific Motorway from Black Hill to Raymond Terrace, in order to alleviate traffic pressure at Hexham.*

This is the same route that quarry trucks will take as they make their way to the Central Coast and Northern Sydney areas.

For all of the above reasons EcoNetwork Port Stephens urges you to deny permits necessary to develop the Stone Ridge Quarry.

**Kathy Brown**

Sec, EcoNetwork PS

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*Living and working on Worimi Country*

## Appendix 1

### 1. [A Guide to More Eco-Friendly Roads \(acbconsultingservices.com\)](http://acbconsultingservices.com)

*Eco-friendly road construction is a type of road construction that reduces the negative impact on the environment. It typically includes practices such as recycling and reusing materials, using environmentally friendly products and minimizing air pollution. However, when we design our roads to be eco-friendly, we should not only consider the environmental impacts of the construction process, but also the longer-term sustainability of our roads.*

### 2. [www.econetworkps.org/sustainable-living/infrastructure-and-transport/sustainable-infrastructure-and-the-importance-of-future-proofing/](http://www.econetworkps.org/sustainable-living/infrastructure-and-transport/sustainable-infrastructure-and-the-importance-of-future-proofing/)

"Recycled Asphalt Pavement (RAP) can be easily and cheaply added to road mixes, again reducing emissions and material use, sometimes for no extra cost. We can make roads using recycled plastic waste and used printer cartridges!"

### 3. [Recycled construction and demolition materials in permeable pavement systems: geotechnical and hydraulic characteristics - ScienceDirect](#) (Rahman et al, Journal of Cleaner Production March 2015)

## Appendix 2

Statistics provided by local community group Voices of Wallalong & Woodville (VoWW):

The proposed Seaham Quarry Project (the Project) involves continuing operations at Boral's existing Seaham Quarry (the Quarry) for an additional 30 years, until 2057. The Quarry located at 139 Italia Road in Balickera NSW, has a development consent to operate until 2035.

The Project is being investigated because the approved hard rock reserves will be exhausted by approximately mid-2027. Boral quarry factsheet – May 2023. The total number of quarries either already operating, or in the process of seeking approval, is staggering. The figures are as follows and send a clear message as to the saturation of the Pacific Highway with quarry haulage vehicles now and into the future.

Karuah East/ Hunter Quarries.....1.5mtpa.....334 trucks/day

Seaham Boral. Proposal for.....2mtpa .....450 trucks/day

Eagleton Quarry. Proposed.....600,000tpa.....134 trucks/day

Brandy Hill. Approved to expand.1.5mtpa.....334 trucks/day.

Hillview Booral. Proposed.....1.5mtpa.....334 trucks/day.

Deep Creek, Limeburner's Crk.....500,000tpa.....111 trucks/day (Decision pending)

Stone Ridge. Proposed.....1.5mtpa.....334 trucks/day.

Martins Creek...refused by IPC but further proposal possible. Total=over 9 million tonnes/annum.

Total average trucks/day = 2,481.

This is a rough estimate for average production. At peak production this number would be considerably larger depending on the variables at each quarry. In fact, close to 4,500 trucks/day. With the figures of truck numbers above in mind we believe the statement... *the modelling suggested that under all three scenarios the interchange would operate at a satisfactory level. Noting the proposal is only expected to generate 30 outbound heavy vehicle movements per hour, the future conditions are expected to perform better than the modelled future scenarios ....* needs to be reviewed with cumulative effect factored in.