



KOALA KOALITION
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6/11/23

SUBMISSION: OBJECTION TO KARUAH SOUTH QUARRY AMENDED PROJECT (SSD 8795)

Koala Koalition EcoNetwork Port Stephens (KKEPS) objects to the Karuah South Quarry Amended Project as it does not reflect considered and justified planning principles and ignores potential and likely cumulative and combined environmental and social impacts.

KKEPS concurs with the detailed statements made in the submissions made by EcoNetwork and the Gloucester Environment Group, and Voices of Wallalong and Woodville (VOWW). This submission expresses concerns about the same issues, but it is unique.

CUMULATIVE and COMBINED IMPACTS

Insufficient consideration has been given to the cumulative and combined impacts of the many hard rock quarries proposed for the region in and around Port Stephens. NSW Planning has not carried out strategic planning for quarries so proponents cannot justify their claims that their extensions or amendments or new greenfield quarries, are truly needed. The justification for the project is therefore flawed.

Existing quarries are having significant environmental and social impacts on communities and the environment that are substantially being ignored.

Quarry proposals are so numerous it is difficult for community and environmental groups to be able to respond to them all within the time constraints applied by different levels of government, which favours the proponents and disadvantages the community.

The main cumulative impact issues that are inadequately addressed are:

- inadequate response to the direct and indirect impacts on community health and well-being, including loss of amenity and character of their community
- absence of suitable mitigation plans to alleviate community concerns
- inadequate traffic assessment
- inadequate assessment of water management issues
- absence of consideration of likely climate change impacts
- absence of planning to reduce greenhouse gas emissions
- insufficient economic contribution to maintain safe haulage routes

- amendment of biodiversity stewardship locations so that the ‘saved’ habitat for corridors becomes less viable with alterations over time
- unacceptable levels of noise, dust, increased vehicle movements, lighting, use of local roads not suitable for haulage, lack of proposed fauna crossings, resulting in increased air pollution, noise, traffic movement and the decline of biodiversity.
- Dangerous quarry haulage driver behaviour on narrow local roads.

ENVIRONMENTAL IMPACTS REMAIN UNACCEPTABLE

- The Biodiversity Report supplied by Ecoplanning Pty Ltd for the proponent dated September 2023 is limited in its validity and has not correctly responded to the questions posed in the original evaluation by the DPE or any subsequent concerns. The report is based on survey data from 2012 and 2018. The koala throughout this report is listed as vulnerable not endangered. The relevant State and Federal Government legislations have not been addressed with respect to vulnerable or threatened species. The identification and mapping of vegetation types are from surveys dated 2012. Therefore, any conclusions from this report regarding the biodiversity of the development site will be unreliable.
- Proponent concludes that “the Project would not significantly exacerbate existing impacts”. Continued or expanded operations will result in continued and expanding impact on a growing list of threatened species that are not adequately addressed by the rudimentary updating of Biodiversity concerns, such as the Koala being uplisted to Endangered in 2022.
- Air Quality – Dust affects animals who not only breath in the material, but ingest it while eating foliage so that it prevents effective digestion. The dust is also known to affect the health of the plants themselves, preventing production of chlorophyll.
- Serious impacts on wildlife and the surrounding environment should elevate the Proponent’s commitment to Air Quality measures, and KKEPS suggests additional commitments must be made through appropriate research and production of a contemporary Biodiversity Development Assessment Report (BDAR), as current policy requires.
- The Proponent concedes that “Limitations to fauna movement across Lot 11 DP1024564 have been identified as a greatest risk to fauna as a result of the Project” and proposes to facilitate movement via overhead ropes and a culvert. There is no recognition that the Project potentially isolates remaining habitat vegetation, including the neighbouring offset conservation area, from east-west connectivity to the surrounding vegetation outside of the development footprint.
- Lack of demonstrated ability to implement *progressive rehabilitation* plans or intention to comply with Planning Priority 5 of the Hunter Regional Plan 2041 to the “longer-term formation of a green corridor”, stating that the “*final landform may suit future industrial land*”.

Yours faithfully,

Carmel Northwood, Convenor