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The General Manager

Port Stephens Council

Re: Objection to Italia Rd and Pacific Highway intersection upgrade - DA 16 - 2023 - 477 – 1

The Italia Road intersection upgrade is pivotal to quarry approval

KKEPS understands that the upgrade of this intersection is proposed to be funded by quarry proponents Boral, Eagleton and Stone Ridge (ARDG). SEE August 2023 intro p1

We believe this has been proposed to circumvent a previous Boral application refusal. In September 2020, Port Stephens Council made their concerns on the impacts on additional road haulage clear by refusing Boral's application to deepen their quarry's pit floor. (Port Stephens Council (2020) SECTION 4.55 - REFUSAL NOTICE OF DETERMINATION: 139 Italia Road BALICKERA, 139A Italia Road BALICKERA LOT: 66 DP: 753200, LOT: C DP: 164505, 7-1985-2683-5 (Boral Resources NSW Pty Ltd)). The reasons given were:

- "The proposed development would cause unacceptable impacts to road safety, resulting in adverse social and economic impacts.
- The proposed development would cause unacceptable impacts to road safety and its approval would be contrary to the public interest."

"In-principle support was provided by TfNSW for a preliminary concept design in June 2022 on the basis that the quarry operators agreed to jointly fund all costs associated with the approval and construction of the required upgrades. A commercial agreement between the quarry operators is in place and (subject to approvals) construction of the intersection is expected to be finalised and operational within the last quarter of 2025." SEE p45

It is appreciated that the proponents have accepted the upgrade must be completed prior to any additional quarry traffic. "The applicant identified their intention to lodge a S.4.55 modification for the lowering of the pit floor for the Boral Quarry. This application can be lodged and assessed concurrently with the application for the intersection upgrade, however, a condition of consent for the lowering of pit floor modification will be applied, stating that the **quarrying works cannot commence until the intersection is constructed and made operational. Approval for the pit floor lowering could not be granted until such time that the intersection upgrade is approved by the**

HCCRPP.” ”Approval of the modification should not be linked to approval of this DA.” SEE p8 (Our emphasis).

Although this implies separate assessment is possible, (even necessary, because how else can it be decided,) we are opposed to the many new quarries and quarry expansions being proposed in the Port Stephens, Dungog and MidCoast LGAs, because each one is being assessed separately, without any strategic planning or justification of the need for their product.

Why would quarries continue to agree to pay for the intersection upgrade if their proposals are refused, or they miss out on highly prized commercial opportunities such as the M1 extension?

The Boral Seaham SEE p.44 states: “The proposed development would bring about significant socio-economic benefits, in terms of improving safety at the Italia Road and Pacific Highway Intersection, which would in turn allow for an extension to the Boral Seaham Quarry and the development of two new greenfield quarries [Stone Ridge and Eagleton]. The quarries would provide significant employment opportunities as well as providing much needed materials to the local and regional construction markets.” SEE p44

The SEE explains that “Council will assess the development application with input throughout the process from the HCCRPP. Council will make a recommendation on the determination of the DA, however the final decision to approve the DA rests with the HCCRPP.” SEE p 6

We must trust that Council and HCCRPP processes will be rigorous enough to see through such eager claims made by the proponents, that are flawed. There should be no automatic approval of quarries because of this intersection upgrade that was perhaps wrongly suggested by TfNSW.

Social and environmental concerns

In the very local Balickera area, we object strongly to the greenfield Stone Ridge and Eagleton quarry proposals being approved, as well as the deepening and extension of the Boral Seaham quarry on environmental grounds and because of the cumulative and combined impact that quarries are having on the local community.

Stone Ridge is a greenfield site that is also within Wallaroo State Forest. It attracted substantial community opposition resulting in 135 objections being lodged. Environmental groups believe that if it goes ahead, it will severely compromise existing wildlife corridors that link Port Stephens with the Mid Coast region. “Licensing any part of the NSW public lands estate to a private consortium for profit is a short-sighted strategy and an injustice to the environment and the community. A massive quarry in Wallaroo State Forest should not be allowed. The harm it will cause is immeasurable”. An open letter was written to Ministers and members of NSW parliament, and media articles published. [Stone Ridge Quarry — HCEC. Cluster of big quarry projects rocks residents living with traffic, dust, noise | Newcastle Herald | Newcastle, NSW](#)

KKEPS strongly opposes the Stone Ridge Quarry proposal on the following grounds:

- **Air Quality** - dust being blown onto houses, water sources and surrounding vegetation will impact humans, wildlife and plants/trees.
- **Noise and vibration** from Clearing initially, then Drilling, Blasting and Crushing, Stockpiling and Loading will impact humans, wildlife and plants/trees, possibly the integrity of the Balickera Water Tunnel providing drinking water to the Grahamstown Dam. Although the Tunnel was recently refurbished by HWC, the impacts from a quarry within the Wallaroo State Forest would not have been considered, nor been expected that sustained heavy trucks would cross it.

- **Blasting** – there will be impacts on humans and the structural integrity of their homes. Local Residents already complain about blasting from Seaham Quarry. There will be impacts on wildlife, including threatened species occupying the Balickera Water Tunnel. There may be effects on Balickera Water Tunnel.
- **Water** - Groundwater – the mine will dig deeper than the water table. The proposed quarry may contaminate or reduce the water available to others.
- **Water** – Drainage/runoff of sediment into may enter creeks that flow into Grahamstown dam.
- **Biodiversity** – threatened fauna and flora will be directly impacted (including forest types). Squirrel glider, brush tailed phascogale and koala were all photographed during surveys. The whole forest is koala habitat. There has been no recent bushfire. The forest should continue to be forest sustainably managed.
- **Social** – way of life, community (cohesion), accessibility, culture, health and wellbeing (traffic and safety), surroundings, livelihoods, decision-making systems (trust in project management). All these social aspects will be affected for local residents, but the most concerning is the traffic and road safety. Local residents and groups are expected to address these points in detail.
- **Cumulative impact** including **Connectivity and Corridors for wildlife** – multiple quarries will be in close proximity and the only corridor across Italia Rd is over the Balickera tunnel, where this quarry is proposed. The proposed quarry will permanently destroy biodiversity by limiting planned connectivity and corridors for wildlife.
- **Suitability** of the site for development – **a quarry to be approved within a publicly owned State Forest is not ecologically sustainable!!**
- **The proposal is not in harmony with the intention of the following local, State and Federal policies: Port Stephens CKPOM, NSW Koala Strategy, National Koala Recovery Plan, Hunter Regional Plan for the Hinterland District, Nature Positive Plans, FCNSW objectives, Ecologically Sustainable Forest Management (ESFM) principles that underpin the NSW Forest Management Framework, and many more environmental regulations too numerous to mention here.**

The bigger picture: quarries

Stone Ridge and Eagleton quarry SSD proposals have not yet been approved, but we believe much will hinge on the approval of this DA to supposedly make access safer to and from the three quarries via the Pacific Highway. It is our opinion **that traffic safety issues will NOT be ameliorated by simply lengthening slipways at Italia Road.**

The cumulative and combined impact of hard rock quarries is more widespread than just the three quarries at Balickera and Seaham. There are 10 existing/proposed quarries within a short distance, all of which use the same routes to reach their markets. “It is expected that the bulk of truck movements to and from the quarries would be generated to/from the south” SEE p27

1. Stone Ridge SSD-10432 Italia Rd, Balickera, ARDG in Wallaroo State Forest
2. Eagleton Quarry Project SSD-7332
3. Seaham quarry (Boral) 139 Italia Rd, Balickera
4. Deep Creek SSD SSD-11591659, 279 Deep Creek Rd, Limeburners Creek
5. Martins Creek quarry
6. Hillview, Maytoms Lane.
7. Brandy Hill Quarry Seaham
8. Karuah East Quarry
9. Karuah South Quarry (in between Karuah and Karuah East Quarry)
10. Karuah Quarry (Hunter quarries)

The bigger picture: housing

The expansion of housing estates in the area, with State government impetus, is also adding to the cumulative and combined traffic. Four developments add almost 1000 residences to Medowie:

1. Tall Trees Estate - 50 lots
2. Tallowood - 238 Lifestyle villages for over 50's.
3. Bower Estate - over 400 residential lots.
4. The Gardens - over 200 residential lots.

Additionally, the Kings Hill Urban Release Area (KHURA) is currently appealing against refusal for the second time in the Land and Environment Court, and the adjoining Monarch's Rise DA for 700 homes on Newline Rd is being assessed. If approved, residents from over 4,000 new dwellings will be wanting to use Italia Road to access the Pacific Highway.

The SEE states that "[h]eavy vehicles from the surrounding existing and proposed quarries would be restricted from using the right out turn from Italia Road to the Pacific Highway. Existing right-out movements from Italia Road to Pacific Highway would remain for light vehicles. Existing right in movements from Pacific Highway to Italia Road would remain for all vehicles." SEE p13

With housing having become such a priority, it is a dangerous mix to add even more heavily laden quarry trucks into domestic traffic. While this proposed upgrade may improve the Italia Rd intersection, any quarry approvals will correspondingly make the intersections at Medowie Rd and Bucketts Way more dangerous. The proposed plan for quarry trucks to turn left onto the Pacific Highway and turn around at the Tarean Road Karuah exit will effectively double the traffic impact along this section of the highway. New housing estates at Karuah are also growing quickly.

If there is no clear plan to upgrade the surrounding road junctions/intersections, then this upgrade should not be approved in isolation without conditions on other upgrades being funded.

Traffic impact assessment (TIA): concerns

There are shortcomings in the Traffic Impact Assessment such as not calculating the Boral expansion, nor the Deep Creek, Martins Creek and other quarry expansions/proposals. Additionally, the traffic from new housing developments has not been calculated.

"Publicly available daily traffic count data is highly variable for the Pacific Highway, with no recent data available near the site. The latest seven-day count data at Twelve Mile Creek from 2018, shows south-bound only traffic volumes of around 10,700 vehicles and at Taree, some 30,000 vehicles two way per day in 2023. Over the last seven years, the Pacific Highway traffic volumes have seen approximately 2-3% growth per annum based on historic traffic volume data published by TfNSW." SEE p26

This is incorrect as more up to date traffic volume data has been made available for the Twelve Mile Creek station in the NSW Traffic Volume Viewer. Statistics from two southbound Heavy Vehicle Checking Stations near Twelve Mile Creek (before the Italia Road intersection) show a steady increase in average weekday heavy vehicle counts since 2015. Between 2018 and 2023 there was an average increase in heavy vehicle traffic per week of 22.4% at T0292 and 24.5% at T0293. This equates to an extra 372 heavy vehicles per weekday at T0292, or 406 heavy vehicles at T0293.

HVCS T0292	Weekday Ave	Weekend Ave	Week Ave	HVCS T0293	Weekday Ave	Weekend Ave	Week Ave
2018	1,585	663	9,251	2018	1,556	667	9,114
2019	1,615	673	9,421	2019	1,631	677	9,509
2020	1,674	683	9,736	2020	1,675	682	9,739
2021	1,740	717	10,134	2021	1,740	717	10,134
2022	1,776	771	10,422	2022	1,751	718	10,191
2023	1,957	773	11,331	2023	1,962	769	11,348

[Traffic Volume Viewer \(nsw.gov.au\)](https://www.nsw.gov.au/traffic-volume-viewer)

According to the SEE, “Italia Road carries approximately 1,376 vehicles per day on weekdays, including approximately 108 vehicles per hour in the AM peak and approximately 114 vehicles per hour in the PM peak. Heavy vehicles made up approximately 20-30% of the traffic stream” SEE p 26

The SEE goes on to say that “all inbound truck movements to the quarries would turn left into Italia Road and all outbound movements would turn left out, travelling to the Tarean Road interchange approximately 11 km to the north to undertake a U-turn.” SEE p27

Any consideration of the potential increase in heavy vehicle traffic from additional mining operations must take into account the significantly higher heavy vehicle traffic counts at Twelve Mile Creek by the Transport for NSW.

The SEE admits that the combined peak hour traffic generation from the three quarries presented in Table 5.1.” of SEE p28-9, “does not include the planned doubling of output from the proposed extension of Boral”. This must also be a factor of any Transport Impact Assessment.

“Scenario 3 – where 20% growth was applied to the existing volumes and an additional 100 articulated trucks per hour undertook a U-turn. The modelling suggested that under all three scenarios the interchange would operate at a satisfactory level. Noting the combined traffic generation of the three quarries is expected to be less than 30 outbound heavy vehicle movements per hour during peak periods, the future conditions are expected to perform better than the modelled future scenarios.” SEE p 29

These figures don’t equate - >100 trucks per hour, then < 30 – which is true? It is unlikely that these figures take into account Deep Creek doing the same after exiting left from Bucketts Way. And what about figures for the three Karuah quarries that are using the same exit/entries at Tarean Road to the Pacific Highway?

The Transport for NSW traffic count shows that there was an increase in heavy vehicle traffic between 2018 and 2023 which exceeded 20%, so scenario 3 potentially needs to be revised to a higher percentage increase.

In addition to heavy vehicle traffic on the Pacific Highway, we would expect any study to also factor in potential increases in domestic traffic should Kings Hill, Monarch’s Rise and other housing developments in Medowie and Karuah.

Justification for quarry materials

There is only a vague justification provided for hard rock materials in quarry proposals. Some quarry proposals cite the M1 extension to Raymond Terrace as needing hard rock material but that project is already underway – will current proposals be ready in time to service that need?

This problematic and vague justification for product and approval of projects, also applies to sand quarries as mentioned [by DPE in their 16/11/23 letter regarding the Sutton Forest proposal](#):

"From a strategic aspect, the quantum of native vegetation clearing and biodiversity impacts is considerable. It is recommended that the Department's Planning and Assessment Group require assessment of the broader context of sand resources having regard to the available supply and the relative lesser sensitivities of accessing sand resources in other existing approved quarries. We note there was a 2019 report prepared for the Department of Planning and Environment by R.W. Corkery & Co. Pty Ltd that essentially indicated an existing approved reserve of sand to supply metropolitan demand for a considerable period until 2036. The 2019 report, however, did not look at the sensitivities and/or impacts associated with the future access to these sand resources. **We believe that there needs to be further justification to address the strategic need for this new sand quarry when supply is seemingly not an issue to justify the vegetation and biodiversity impacts at Sutton Forest.**"

Moreover, [Hunter Regional Plan 2041 \(nsw.gov.au\)](#) the **Hunter Regional Plan 2041** seeks a more environmental approach to future projects in order that the Hunter region becomes a healthy, sustainable and thriving place for everyone. Objective 1 of the plan seeks to diversity the Hunter's mining, energy and industrial capacity, yet in Port Stephens mining appears to have become a type of monoculture. Objective 6 seeks to conserve heritage, landscapes, environmentally sensitive areas, waterways and drinking water catchments which includes improving biodiversity corridor connections. These objectives do not seem to be in play with the potential implications of making the intersection safer for increased volumes of heavy vehicle traffic.

"Noting the lack of pedestrians, cyclists and public transport users in the vicinity of the site, there is not expected to be any impact to these road users." SEE p31. This statement denies Council's [Hinterland Place Plan | Port Stephens Council \(nsw.gov.au\)](#) which clearly proposes the community needs such facilities. This statement also ignores the Kings Hill (KHURA) appeal process, the Monarchs Rise DA proposal, and other priority housing developments, already mentioned above.

KKEPS believes there is an urgent need for Strategic and Conservation Planning for hard rock quarries in the lower Hunter, and a proposal to the Government will soon be released.

Impacts on endangered koalas and other threatened species

"Impacts of vehicle strikes on threatened species or on animals that are part of a TEC Given the nature of the proposed development, impacts of vehicle strikes on threatened species or animals are unlikely to be exacerbated beyond that of the previously approved roads. Impacts through vehicle strikes are further reduced through repair to koala crossings over the Balickera Canal, beneath the Pacific Highway. To minimise potential impacts from increased movement of vehicles during the construction phase appropriate mitigation measures will be enforced, as outlined in Section 5.3." BDAR Dec 2023 p47

There is no wildlife rescue organisation mentioned in the proposal to deal with injuries or disease. The Port Stephens Koala Hospital has licence to rescue other wildlife species and should be documented as the first point of contact. [Koala Rescue - Port Stephens Koalas](#)

"A qualified fauna ecologist is to inspect vegetation on site prior to clearing and remain present on site through the process of clearing vegetation." BDAR p60 This statement fails to acknowledge that all work should cease until the koala moves on of its own accord.

Additional traffic will provide additional opportunities for wildlife road kill without better mitigation plans to provide safe crossings. There are no such plans under consideration for the Pacific Highway or Italia Road. Many koalas have come to grief on the highway. I have personally collected mutilated corpses to ensure data was recorded, but many more would never have been reported.

The Bridge widening plan p26 of Civil engineering plan and Fig 3.3 SEE p16 shows a koala crossing to assist koalas to cross the Balickera Canal which is apparently a repair. We assume this is solely a north/south route.

This roadworks project may provide an ideal opportunity for a link/culvert to be built underneath the highway to allow koalas to travel to east/west safely. The [2020 Port Stephens Koala Population report by OWAD \(WWF funding\)](#) clearly substantiates the deleterious effect on genetic diversity created by the eastern koala population being isolated by the highway.

An east-west koala crossing under the highway would facilitate genetic exchange and may be crucial to koalas and other wildlife species surviving climate change by allowing them to access higher altitudes and cooler temperatures where forests may offer preferred conditions in the future.

A substantial objection to the Stone Ridge and Eagleton quarry proposals relates to corridor disruption across Italia Road. The only place for terrestrial animals to cross is where the Balickera Canal goes underground – near the proposed entry to the new Stone Ridge quarry and directly opposite the existing Boral Seaham quarry entry. The approval of Stone Ridge would therefore affect driver and fauna safety through combined intersections causing reduced visibility.

Community opposition

Three quarry approvals are intrinsically linked to the approval of this intersection upgrade: Boral Seaham, Stone Ridge and Eagleton, all on Italia Road.

Local residents are already under stress from the noise of Boral quarry – including blasting, crushing, loading and transport along their narrow rural road. 11 months of roadworks will add to their stress and impact their safety and social amenity.

The Italia Road intersection being pivotal to quarry approval, clearly provides substantiation for the approval of the deepening and extension of Boral's existing quarry and the two greenfield quarries Eagleton and Stone Ridge. **Quarries are heavily opposed by the local community.**

Conclusion

Approval of the Italia Road upgrade and the expected following approval of three quarries, will necessitate upgrades for other intersections for which there is no known funding. Strategic and Conservation Planning for hard rock quarries in the lower Hunter must precede quarry approvals.

KKEPS therefore concludes that the Italia Rd intersection upgrade should not be approved.

I have not made any political donations.

Yours sincerely,

Carmel Northwood

Convenor