Submission Document

CLOSE DATE: 11 Dec 19
POST BY Fri 6 December

Attention: Director - Coal and Quarry Assessments
Planning and Assessment
Department of Planning, Industry and Environment
GPO Box 39, Sydney NSW 2001

Re: Public Submission for SSD – 7293, Sancrox Quarry Expansion Project,

https://www.planningportal.nsw.gov.au/major-projects/project/9946

Dear Sir/Madam,
I wish to submit my objection to the above development application

My Name: _

My Address

My objection to the proposal is on the grounds listed in ticked boxes below:

☑ The Port Macquarie region is expanding rapidly. This development is in the Sancrox area, approximately 6km west of Port Macquarie, which is undergoing significant residential development that will be directly affected by the increased environmental impact of this quarry expansion.

☑ The Sancrox area has already had a substantial increase in noise (24/7), due to the upgrading of the highway to a motorway. Despite noise mitigation measures, the rural ambience is already reduced and any extra noise generation, especially at night, will only make it worse.

☑ The proposed 'quarry expansion' is more than that! It also includes two new additional operations, concrete batching and asphalt production. There are already other concrete and asphalt plants in the region that have the capacity to service the demand.

☑ The noise impact of a 24 hour, 7 days a week operation is particularly concerning. There will be no respite from constant noisy plant and equipment. Daytime operation excluding Sundays is the maximum that should be allowed in a community precinct. The processes carried out do not have to run at night and can be easily shutdown/restarted.

☑ The project includes "clearing 43.1 hectares of native forest vegetation, 0.55 ha of which is identified as the threatened ecological community Subtropical coastal floodplain forest (NR117)" with serious and irreversible environmental impact. (Ref: DA, Annex C)

☑ The Greater Sancrox Area Structure Plan (Port Macquarie Hastings Council, 2014), identifies the land to be cleared as medium to high activity koala habitat. More recently the Draft Coastal Koala Plan of Management 2018 produced by PMHC identifies the area as core koala habitat. An objective of the CKPOM is that there will be no net loss of core koala habitat after 6 years from adoption of the plan. The clearing also destroys an identified "critical link and vegetation connectivity in the immediate, and the Greater Sancrox Structure Plan, eliminating traverses by animals south-north through the centre of the Development Site". (Ref: DA, Annex C)

☑ The Biodiversity Assessment Report (DA, Annex C) was based on insufficient field work conducted in 2015, four years ago. Current, independent and comprehensive field surveys are required to validate the report. A major flaw of the EIS is that it unreasonably dismisses the significance of the site for threatened species despite Office of Environment and Heritage records of Koalas at six locations at least (2008 -2013), and the presence of Spotted Gum, *Corymbia maculata* which has the potential to provide winter nectar for the migratory critically endangered Swift Parrot.

☑ The EIS states that no evidence for the threatened plant species likely to occur on the site was recorded during field surveys undertaken as part of the BAR. However SLR Consulting Australia which conducted the orchid surveys concluded that until a positive identification can be made, it is recommended that the *Dendrobium* specimen recorded should be treated as the threatened species *D. melaleucaphilum*, which is listed as endangered in NSW under the (former) Threatened Species Conservation Act.

☑ The State of Emergency was declared in NSW due to the catastrophic bushfires in November 2019 which may have killed an estimated 350 koalas. Injured and now homeless koalas may have moved onto the proposed development site.

☑ The environmental impact is serious and irreversible. The proposed development site supports unique biodiversity with a total of 27 threatened species identified so far, including 17 birds and 9 mammals, including 7 vulnerable microchiropteran bats identified. The native vegetation should be retained to combat Australia's current extinction crisis with some 964 of the 1,250 Australian terrestrial animal species currently listed as 'Threatened'. (Ref. https://www.environment.nsw.gov.au/topics/animals-and-plants/native-vegetation/why-is-native-vegetation-important)

☑ Proposed "Ecosystem credits" system of payment by the developer to offset destruction of threatened species does not compensate for the serious and irreversible impact on the natural environment.

☑ Native vegetation in NSW stores a significant amount of carbon. This deforestation and forest degradation will contribute to global greenhouse gas emissions and fewer trees in a region can contribute to drought by reducing the amount of local rainfall.

☑ The natural water on the site, currently supporting native flora and fauna, will be diverted to industrial use and North and west alluvial flood plains of the Hastings River and Haydons Creek will be impacted.

☑ The company operating this site has a poor track record of environmental compliance and were fined $15,000 by the Environmental Protection Authority in 2016 for breaches of their water management operational obligations. (Ref: EPA 24.03.2016).

☑ The proposed works impact Aboriginal heritage sites, including a Scar Tree and ceremonial site of "high cultural significance." (Ref: Annex D, Heritage Report)

☑ Increased quarry trucks movement 24 hours a day 7 days will effect local road safety.

☐ I AGREE to the Department publishing my submission on its website in accordance with The Department of Planning, Industry and Environment Privacy Policy.

☑ I DO NOT agree to the Department publishing my submission on its website in accordance with The Department of Planning, Industry and Environment Privacy Policy

I have made no reportable political donations in the last two years.

Signed _____ **Date:** 4/12/19

Further comments may be attached