



Our Ref: DOC21/425864

Your Ref: SSD-7293

Department of Planning Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Ms Melissa Anderson

Dear Ms Anderson

RE: Sancrox Quarry Expansion Project (SSD-7293) (Port Macquarie-Hastings)

Thank you for your notification dated 25 May 2021 about the proposed quarry expansion development at Sancrox in Port Macquarie seeking comments from the Biodiversity and Conservation Division (BCD) of the Biodiversity, Conservation and Science Directorate in the Environment, Energy and Science Group of the Department of Planning, Industry and Environment. I appreciate the opportunity to provide input.

We have previously provided comment in relation to this proposed development on 11 December 2019 and 3 April 2020.

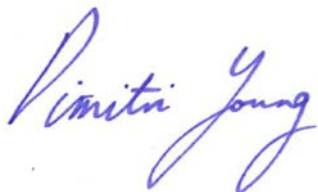
We have reviewed the latest Biodiversity Assessment Report (BAR) prepared by SLR dated May 2021 and have identified several issues in relation to the BAR which are discussed in detail in **Attachment 1** to this letter.

In summary, the BCD recommends that:

1. Further information must be provided in the BAR and calculator in accordance with the FBA and operational manuals.
2. The anomaly in the BAR and FBA calculator regarding the number of plots for vegetation zone NR 263 Mod/Good must be corrected.
3. Further avoidance of biodiversity values should be incorporated into the proposed development.
4. Further avoid and mitigate options need to be considered as part of the proposal to reduce the impact on koalas, their habitat, and their movement corridors.
5. The indirect impacts of the development have not been considered in accordance with the FBA and further information and justification is required.

If you have any questions about this advice, please do not hesitate to contact Mr Krister Waern, Senior Operations Officer, at krister.waern@environment.nsw.gov.au or 6640 2503.

Yours sincerely



23 June 2021

DIMITRI YOUNG
Senior Team Leader Planning, North East Branch
Biodiversity and Conservation

Enclosure: Detailed BCD Comments – Sancrox Quarry, Port Macquarie

Attachment 1: Detailed BCD Comments – Sancrox Quarry, Port Macquarie

The Biodiversity and Conservation Division (BCD) has reviewed the latest Biodiversity Assessment Report (BAR) prepared by SLR dated May 2021 and we provide the following comments.

Finalising FBA Calculator

We note that the Framework for Biodiversity Assessment (FBA) has been used to assess and determine the impacts of the proposal. Although the BAR has been provided, the FBA calculator to determine the biodiversity credit requirement has not been finalised. The FBA calculator is still in Work In Progress (WIP) status.

The calculator must be finalised to enable the credit obligation to be approved. However, we have been able to review the calculator and we provide the following comments.

The FBA calculator has provided information relating to the percentage of remaining vegetation after development for the inner and outer assessment circles. This information shows that there is no change to the percentage of remaining vegetation for the outer assessment circle when the clearing of the development is taken into account. Further justification and data analysis should be provided in the BAR to support this position.

We also note that the connectivity score in the calculator has not been discussed or mapped in the BAR. This is an important assessment consideration which needs to be detailed in the BAR and then reflected in the calculator.

Further information about the above two matters can be accessed by following the FBA and the operational manuals which explain the required information. The applicant should also check Appendix 7 of the FBA which tabulates the minimum requirements for the FBA.

In relation to the number of plots assessed, we note that Table 11 of the BAR indicates that four plots were undertaken for vegetation zone NR 263 Mod/Good. However, the calculator has five plots of data contributing to the calculation of credits for this vegetation zone. This anomaly must be corrected.

BCD Recommendation

1. Further information must be provided in the BAR and calculator in accordance with the FBA and operational manuals.
2. The anomaly in the BAR and FBA calculator regarding the number of plots for vegetation zone NR 263 Mod/Good must be corrected.

Avoiding impacts

We note that the proposed development site is in a biodiversity sensitive area and a biodiversity corridor which provides habitat for many threatened species including the koala.

The current development footprint will impact on these biodiversity values. The BCD considers that the biodiversity impacts should be reduced to limit the area of biodiversity impact for the proposal. In our previous letter dated 3 April 2020 we also identified that further avoid and minimise options should be considered. The requirements to avoid and minimise impacts on biodiversity values are detailed in section 8 of the FBA.

The BCD does not support the level of biodiversity impacts currently proposed.

BCD Recommendation

3. Further avoidance of impacts on biodiversity values should be incorporated into the proposed development.

Koala impacts

We understand that based on the current survey results and modelled activity levels, combined with previous Koala survey results, and the widespread occurrence of several Koala feed trees within the forested parts of the site, the site is considered to be habitat for the Koala, as a species credit species under the Framework for Biodiversity Assessment.

The Koala Survey and Assessment report dated December 2020 identifies that:

'The total area of Koala habitat within the site is estimated to be around 42.6 hectares. The removal of Koala habitat associated with the proposed expansion of the Sancrox Quarry will reduce the availability of foraging and breeding habitat for the local Koala population and will increase barriers to local movement and dispersal of Koalas in the locality, particularly in a north-south direction.'

This large impact to koala habitat is not acceptable to the BCD, particularly as this is likely to reduce the effectiveness of the NSW Government's Saving Our Species (SOS) program for the koala and the NSW Koala Strategy. These two NSW government initiatives aim to stabilise and increase koala populations across NSW.

We also note that the locality of this proposed development is in an area where the recent bushfires did not impact the native vegetation. However large areas further East and South of the subject site have had bushfires affect native vegetation including areas of koala habitat. Areas of koala habitat that have not been affected by bushfires are even more important in the landscape to provide suitable refuge and corridor movement while the bushfire impacted areas recover. Retaining large connected vegetated areas in the landscape contributes to the resilience of the local koala populations.

BCD Recommendation

4. Further avoid and mitigate options need to be considered as part of the proposal to reduce the impact on koalas, their habitat, and their movement corridors.

Indirect Impacts

The adequate consideration of indirect impacts is a matter which we have raised in our previous two letters (3 April 2020 and 11 December 2019).

Section 5.4 of the BAR identifies the indirect impacts of the proposal. Although acknowledging that indirect impacts are likely to occur from the proposal, the BAR also goes on to indicate, very broadly, that these indirect impacts will be minimal as indicated in the text below from page 55 of the BAR.

'The post-mitigation measures ensures minimal light and noise impact on flora and fauna species. The revised Biodiversity Assessment Report includes further assessment of edge effects, concluding that edge effects are unlikely to adversely affect local populations of native flora and fauna, and that there are not likely to be any threatened species affected by edge effects, as no such species are likely to be inhabiting the fringes of the proposed pit footprint, or rely on those areas for their breeding or other life cycle processes'.

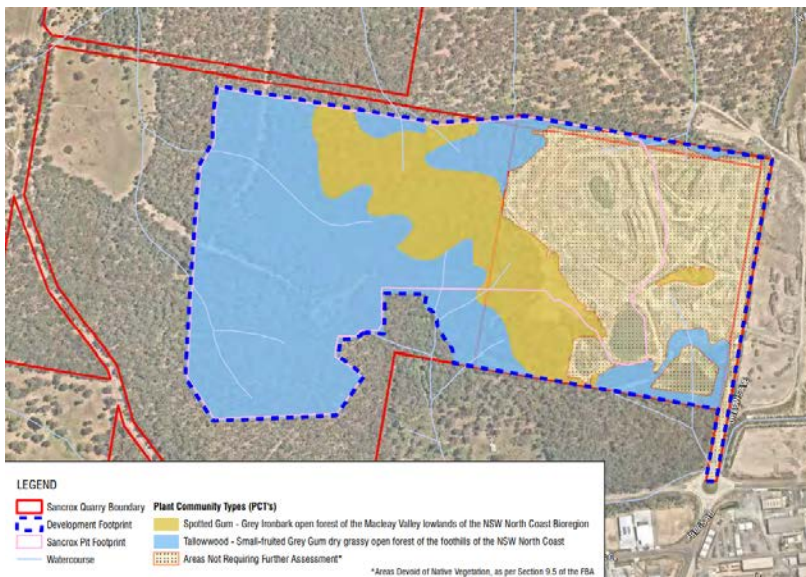
Although the BAR has described some mitigation measures to address indirect impacts, it is still not clear where these mitigation measures, such as weed control, are proposed to be undertaken. For instance, is weed control only limited to the development footprint, or within a nominated distance from the development footprint, or is weed control proposed for the whole of the site? The adequate evaluation of the mitigation measures requires more detail to be provided.

As described in detail in our previous correspondence dated 11 December 2019, there are likely to be indirect impacts on the retained vegetation which cannot be fully addressed by mitigation measures. These remaining impacts can be offset as described in our previous letter. Further, the

Biodiversity Assessment Method (BAM) operational manual stage 2 (page 18) describes in detail how offsetting indirect impacts can be undertaken.

We note that the revised proposal has avoided direct impacts to the previously identified Endangered Ecological Community (EEC). The indirect impacts to this EEC still need to be considered. The revised BAR does not show the location of this EEC and its relationship to the proposed development footprint. The potential indirect impacts on the EEC need to be described within the BAR.

We also note that the proposed development footprint is located on the southern boundary of the subject site and provides no buffer to that property. The biodiversity values of the adjoining property are likely to be similar to those described in the BAR for the proposal. The potential indirect impacts of the proposed development on the biodiversity values of the property to the south need to be considered as part of the BAR. The proposed development footprint as shown in the BAR is detailed below.



BCD Recommendation

5. The indirect impacts of the development have not been considered in accordance with the FBA and further information and justification is required.