



Gloucester Environment Group Inc

We acknowledge the Traditional Owners of the Land on which we meet and pay our respects to the Elders - Past, Present and Emerging

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10th July 2023
NSW Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

REF: APPLICATION NO: SSD-10432

PROPOSAL: Stone Ridge Quarry Project.

GEG SUBMISSION OF OBJECTION STONE RIDGE QUARRY

This submission is written on the Traditional Lands of the Gathang speaking people, Biripi and Worimi Country.

Gloucester Environment Group (GEG) is an incorporated volunteer organisation with over 120 members who reside in or near the Gloucester Township in the Mid Coast Council region. A substantial number of our members are rural landholders.

GEG members provide, assist and plan for environmental enhancement projects in our region and take a keen interest in the state of our natural environment and natural resource management.

Our active projects, well recognised and supported by both Council and the community include Rivercare and Koalaways, where over the past few years thousands of indigenous trees and plants have been planted on private and public lands. Our aim is to restore and improve our natural environment for humans, natural systems and wildlife.

GEG is concerned that our local Council's call for Strategic Planning for Quarry developments in our region has fallen on deaf ears¹. As a result, connecting viable koala habitat – as well as functioning ecosystems for many threatened species – will be potentially lost forever.

INTRODUCTION

¹ <https://www.greatlakesadvocate.com.au/story/6265490/midcoast-council-raises-concerns-about-proposed-karuah-quarry/> Department of Planning and Environment asks for Council Comment Great Lakes Advocate
July 16 2019

GEG objects to The Stone Ridge Quarry proposal (the Project) in the Wallaroo State Forest. The regional economies of both Port Stephens and Mid Coast Councils depend on our natural environment. GEG's submission to the Biodiversity Conservation Act 2016 Review earlier this year stated our government must put the welfare of the environment above development aspirations because of the climate catastrophe we face and the ongoing loss of our biodiverse natural ecosystems.

Both climate change² and biodiversity loss represent a financial risk to the Hunter region and beyond³.

GEG requested the Review to call an immediate moratorium on native forestry logging activities in order to conserve biodiversity at bioregional and State scales and until such time that robust, independent review and appropriate and better protection mechanisms are afforded to fauna species and the natural systems of our environment.

The Natural Resources Commission noted in 2022 *"that NSW forests – whether they be in national parks, state forests, Aboriginal land, private land or Crown land – are under sustained threats, placing many of the services and values they provide at risk"*⁴.

Along with industrial scale logging in our State Forest estate, GEG strongly objects to industrial quarry developments in State forests which permanently alter our shared landscape and the integrity of functioning forest ecosystems.

INADEQUATE STAKEHOLDER ENGAGEMENT AND SCOPE OF COST BENEFIT ANALYSIS

The Project will prohibit access to a great proportion (139 ha Referral area including a nominated 94 ha disturbance area) of Wallaroo State Forest for 30-50 years, possibly longer. It is not surprising then, that the public is genuinely concerned by the agreement formed between the proponent and FCNSW in 2018 without due community consideration and consultation.

Both FCNSW and the proponents have failed to recognise the importance and value of the State Forest estate to the public now and into the future and the far-reaching impact of another major quarry development in the region. The cumulative impacts of the proposal, including traffic impacts extend well beyond the limited area in which consultation was carried out.

The claim that community consultation has been successful or effective cannot be supported⁵, as a number of environmental and community stakeholder groups were not consulted about the proposal prior to the exhibition of the EIS, including GEG. This situation

² <https://www.abc.net.au/news/2023-07-05/hottest-day-ever-globally-recorded/102563068> **We just had the world's hottest day on record, data shows — and experts say it's only going to get hotter** Evan Young 5 Jul 2023 at 4:12pm Wednesday 5 Jul 2023 at 4:12pm, updated Wed 5 Jul 2023 at 7:12pm

³ <https://www.theguardian.com/commentisfree/2021/jul/04/biodiversity-loss-could-wreck-the-global-financial-system-and-its-only-a-matter-of-time> **Biodiversity loss is a risk to the global financial system** Geoff Summerhayes and Laura Waterford 4 Jul 2021

⁴ <https://www.nrc.nsw.gov.au/fmip-insight#fmip-insights-report> **Insights for NSW forest outcomes and management Nov 2022**

⁵ 5.0 Engagement EIS Final

also reflects badly on FCNSW who have undervalued the forest estate which they manage on behalf of the State's constituents.

The Proponent states "procurement" and "employment opportunities" were seen as key benefits of the project, as well as the upgrade to Italia Road and Pacific Highway intersection. Negative impacts included social amenity concerns including noise and dust, health and wellbeing, personal and property rights, impacts on surface and ground water, ecological impacts and traffic impacts.⁶

As no thoughtful consideration was provided of alternative options to the Stone Ridge Quarry, nor to the impact of the proposal on the value of the region's natural capital, it is considered the consultation process was biased in favour of the quarry development.

The Hunter Regional Plan 2041⁷ states that -

Development proposals for aggregate extraction will be promoted if they are in accordance with the district planning principles and local strategic planning. They should balance economic benefits with the protection of the environment and local communities.

Planning for these areas and the surrounding areas must ensure:

- *mining and quarrying remain a permissible use, with development consent, in the resource areas*
- *appropriate land use buffers are provided between these areas and future development*
- *these areas contribute to the longer-term formation of a green corridor, both during extraction (e.g. by maintaining existing vegetation links and/or restoration on areas not being quarried or mined) and on completion of resource extraction.*

It is GEG's conclusion that Wallaroo State Forest should never have been made available for a quarry development as it is within a number of designated wildlife corridors.(see below)

Quarry development applications are removed from Council via the SSD pathway. Mid Coast Council has been calling on the Department of Planning and Environment to strategically plan for quarry developments in our region in order to ensure the environment is protected now and into the future and social and traffic impacts can be managed for a number of years.

JUSTIFICATION FOR THE PROJECT IS QUESTIONABLE

Evidently there are 52 open quarries and 152 intermittently operating quarries in the broader Hunter region⁸.

It is very difficult for the public to ascertain the veracity of not only ARDG's (the Proponent) assertions but other new quarry developers in our region, that unless their project goes

⁶ 5.4 Key community Issues

⁷ <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hunter-regional-plan-2041.pdf>

PLANNING PRIORITY 5: Promote sustainable use of mineral and energy resources

⁸ Email June 15 2023 to writer of this submission from Ben Withers, Principal Inspector Central Assessment Unit RE: HPE CM:Legacy Mines ben.withers@regional.nsw.gov.au

ahead there will be “*significant supply-side pressure for high quality quarry products*” in the market⁹.

The Proponent states that “*if no new resources are identified and brought to market, the growth areas of the Lower Hunter and Central Coast will experience significant supply side pressure for high quality quarry products*”¹⁰ but fail to give an overview of their current and future supply chain. The demand for their contribution to the supply stream, given there are a number of other quarry developments recently approved, under consideration and preparing EIS’s, is not known.

The justification that supports their project approval seems to be that the Proponent will pay an undisclosed royalty to FCNSW for each tonne of quarry product sold. We do not believe this is a fair economic return for the destruction of a substantial portion of Wallaroo State Forest. If the project becomes a stranded asset, it is the public that will directly wear the costs of the failed enterprise.

There are a number of large operational hard rock quarries either operating or in the pipeline in the lower Hunter region in close proximity to the Stone Ridge proposal, –

- Karuah Quarry and Karuah East Quarry extended from 2034 to 2054 1.5 mill tonnes pa
- Karuah South Quarry Amending EIS 600,000 tpa over 25 years
- Deep Creek Quarry EIS Submitted 500,000 tpa over 30 years
- Hillview Hard Rock Quarry preparing EIS 750,000 over 20 years
- Brandy Hill Quarry approved expansion 2020 for 30 years 700,000 pa
- Boral Seaham Quarry preparing EIS doubling current output up to 2 million tonnes pa
- Eagleton Quarry 600,000 tonnes pa up to 30 years Preparing amendment report
- Stone Ridge Quarry up to 1.5 million tonnes pa over 30 years
- Martins Creek Quarry (100 year old quarry – extension application recently refused)

A 2019 report to the Department of Planning and Environment advised that under then current approvals, there were sufficient reserves of hard rock to meet the demand for crushed rock products to the Greater Sydney Region to beyond 2036 – even under higher demand scenarios¹¹.

In 2020¹² the Proponents proposed at least 500,000 tonnes of extractive material per annum over a term of at least 20 years. Now the Project proposes 1.5 million tonnes pa over 30 years. Without showing evidence of their assertions that the Project is needed, including the disclosure of royalty payments to FCNSW over the anticipated lifetime of their project, the project is questionable and cannot be justified.

⁹ Strategic Context 2.7.2 ‘Do Nothing’ Alternative

¹⁰ 7.3.1 Do Nothing Option

¹¹ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-894%2120210203T100021.561%20GMT> **Supply and Demand Profile of Geological Construction Materials for the Greater Sydney Region 16 April 2019** Prepared for: Department of Planning and Environment ABN: 38 755 709 681 323 Prepared by: R.W. Corkery & Co. Pty. Limited Geological & Environmental Consultants ABN: 31 002 033 712 In Conjunction with: Ecoroc Pty Ltd and: Nine-Squared Pty Ltd and: Ausrocks Pty Ltd

¹² SEARS 22/04/2020 Ref No.: F2018/00905 Planning & Assessment Department of Planning Industry & Environment

As opposed to the other quarry developments listed above, the Project intends to take over management of public land. The Proponents have inadequately assessed and carelessly ignored the economic potential and environmental value of Wallaroo State Forest if left unquarried.

Objective 6 of the Hunter Regional Plan 2041¹³ notes that a connection to nature is at the centre of the Plan, and that areas of high environmental value are protected to contribute to a sustainable region. Areas of high environmental value include:

- *Areas protected for conservation including existing conservation areas, national parks and reserves, declared wilderness areas, marine parks, Crown reserves dedicated for environmental protection, and conservation and flora reserves*
- *Important habitat mapping for serious and irreversible impact species*
- *Koala habitat*
- *Native vegetation of high conservation value, including vegetation types that have been over-cleared or occur within over cleared landscapes, old growth forests and rainforests*
- *Key habitat for threatened species and populations and threatened ecological communities*
- *Wetlands, rivers, estuaries and coast features of high value*

It is fair to assume that if the Project is approved the capital and ongoing costs associated with the provision of environmental offsets and environmental management will need to be recovered by setting product costs to recover environmental costs¹⁴. This should be anticipated and accounted for in the EIS as the end product may be very expensive and customers may well choose a cheaper provider.

There are two real risks associated with Project approval – one that the community will pay a premium price for the end product and then, be left with the legacy of a destroyed and degraded forest area depleted of today's biodiversity values.

There are alternatives to relying on royalties from quarrying to maximise economic return from Wallaroo State Forest. It is not simply a case of 'quarry or die' as the proponents would have us believe.

UNACCOUNTED VALUES OF WALLAROO STATE FOREST

The Stone Ridge Quarry proposal is on public land managed by FCNSW. FCNSW have a generally understood aim to ensure forests are managed in an ecologically sustainable way - to "grow"¹⁵ the value of our forest estate, and provide the public with opportunities to recreate and reconnect with nature¹⁶.

¹³ <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hunter-regional-plan-2041.pdf>

¹⁴ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-894%2120210203T100021.561%20GMT> **Supply and Demand Profile of Geological Construction Materials for the Greater Sydney Region 16 April 2019** Prepared for: Department of Planning and Environment ABN: 38 755 709 681 323 Prepared by: R.W. Corkery & Co. Pty. Limited Geological & Environmental Consultants ABN: 31 002 033 712 In Conjunction with: Ecoroc Pty Ltd and: Nine-Squared Pty Ltd and: Ausrocks Pty Ltd

¹⁵ <https://www.forestrycorporation.com.au/about/our-strategy>

¹⁶ <https://www.forestrycorporation.com.au/visit>

*“Forestry Corporation of NSW has been managing environmental sustainability, tourism and renewable timber production in NSW’s State-owned commercial native and plantation State forests for more than a century. We balance environmental conservation and community recreation with timber production and access for other primary industries such as grazing and beekeeping to ensure our forests sustainably deliver multiple benefits to the community for the long term.”*¹⁷

The public cares about nature. 97% of Australians want to see more actions to conserve biodiversity, and 80% or higher want to see nature restored in cities and towns even if they don’t know the full extent of the biodiversity crisis we face.¹⁸

The Project area missed the catastrophic 2019/2020 climate fuelled fires. Forestry Corporation has reported that around 830,000 hectares of native State Forests and 62,000 hectares of State forest timber plantations across NSW were impacted by fire in some way – which is about half the State Forest estate.¹⁹ Over 2.7 million hectares of national parks (38% of the NSW national park system) burned.²⁰

It is noted that the agreement between the proponent and FCNSW as “willing” partners was signed off in 2018, at a time when the general community was not prepared for the impacts of the impending climate fuelled fires.

It is significant that the Wallaroo State Forest has remained unlogged for 40 years²¹ as forest values increase with age. These values represent environmental and financial benefit and opportunity to the citizens of NSW – the main stakeholders of both Forestry Corporation New South Wales (FCNSW) and the proponent’s proposal.²²

A 2021 study looking at alternative uses of native State Forests, albeit in Southern NSW, concludes that higher value environmental and recreational benefits from the forest under a “no logging scenario” include carbon sequestration services (earning carbon credits) and tourism and recreation services.²³

Native State Forests are one of our State Government’s cheapest options for carbon abatement. Forest values for carbon abatement increase with age and should be left to regenerate.

It should be expected that either FCNSW, as the current land managers, or the proponents as future land managers, provide a cost benefit analysis showing the resultant loss of the

¹⁷ <https://www.forestrycorporation.com.au/about/who-we-are>

¹⁸ **97% of Australians want more action to stop extinctions and 72% want extra spending on the environment** Liam Smith Director, Behaviour Works, Monash Sustainable Development Institute, Monash University, Jaana Dielenberg University Fellow, Charles Darwin University, Kim Borg, Research Fellow at Behaviour Works, Monash University, Rachel Morgain Senior Research Fellow, School of Ecosystem and Forest Sciences, The University of Melbourne Published in The Conversation, June 20 2023

¹⁹ <https://www.forestrycorporation.com.au/operations/fire-management/fire-impact-of-2019-20>

²⁰ <https://www.environment.nsw.gov.au/topics/fire/park-recovery-and-rehabilitation/recovering-from-2019-20-fires/understanding-the-impact-of-the-2019-20-fires>

²¹ 2.4 Environmental and Social Context

²² <https://www.forestrycorporation.com.au/about/pubs/corporate/statements-of-corporate-intent> STATEMENT OF CORPORATE INTENT 1.ii to maximise the net worth of the State’s investment in the Corporation

²³ **Comparing the value of alternative uses of native forests in Southern NSW** Frontier Economics and Prof. Andrew Macintosh, ANU | 30 November 2021 <https://www.frontier-economics.com.au/documents/2021/11/comparing-the-value-of-alternative-uses-of-native-forest-in-southern-nsw.pdf/>

carbon abatement service Wallaroo State Forest currently serves, as opposed to establishing and operating a quarry that returns royalty payments.

The Frontier Economic Report states –

4.3.3 Value of carbon abatement Logging native forests reduces the stocks of carbon stored in biomass and soils, contributing to global climate change. The extent of the climate impacts depend on the nature of the forests and the extent to which the biomass that is harvested is used for long-lived wood products like furniture and framing.

The sale of these carbon credits could result in a revenue stream for FCNSW.

Regardless of whether credits are traded, by preventing the logging of native trees there is a benefit to Australian society associated with carbon sequestration due to the role of carbon emissions in global climate change. Our analysis prices the value to society from avoided carbon emissions at \$20/tCO₂, based on the prevailing spot price of carbon credits issued under the Australian Government's Emissions Reduction Fund (Australian carbon credit units, or ACCUs).

Land clearing and deforestation are responsible for 25% of annual carbon emission in Australia²⁴ and they remain the number one driver of extinction in Australia and worldwide.²⁵

The proponents have noted²⁶ that the Wallaroo State Forest is used informally used for recreational activities, such as 4WD and dirt biking. They fail to recognise it is also used for bushwalking and trekking, birdwatching, horse riding and mountain bike riding²⁷. All these activities if responsibly managed can create an alternative revenue stream to the State and employ a considerable number of people.

The proposal is located 2km north of the existing Boral Seaham Quarry (who plan to double their production) and the proposed Eagleton Quarry, both located on south side of Italia Road. As well, the motor racing tracks Ringwood Park Motor Complex and Circuit Italia are located south of Italia Road and access is off Italia Road.

The Wallaroo State Forest provides a substantial buffer zone to those noisy developments and can be used and managed to maintain environmental service provision to both the local community and displaced wildlife from the existing Boral quarry, proposed Eagleton quarry and motor cross operations.

There are a number of economic studies that highlight opportunities available to decision makers to capitalise on our natural environment at the same time as preserving the environmental services those areas presently serve.

²⁴ Department of Industry, Innovation, Climate Change, Science, Research and Tertiary Education (DISER) 2013 Australian National Greenhouse Accounts: **Australian Land Use, Land Use Change and Forestry Emissions Projections to 2030** Commonwealth of Australia

²⁵ Maxwell, S.L., Fuller, R.A., Brooks, T.M.&Watson, J.E.M. (2016) Biodiversity **The ravages of guns, nets and bulldozers**

²⁶ 3.1.2 Describe any existing or proposed uses for the project area

²⁷ See <https://www.alltrails.com/parks/australia/new-south-wales/wallaroo-state-forest> and <https://www.rotorburn.com/forums/index.php?threads/wallaroo-national-park-mountain-bike-track-newcastle-area.231511/> and <https://www.alltrails.com/trail/australia/new-south-wales/wallaroo-long-loop>

One example provided in the 2021 Frontier Economics Study²⁸ shows the potential to preserve the State Forest estate and benefit to the community - without quarrying the forest materials beneath the ground:

Cost and benefit from recreational area

*To estimate the potential value of recreation from preserved native forestry, we assume a single usage scenario: **the development of a mountain biking trail network**. We consider this to be an appropriate 'next best' opportunity foregone by logging, given the interest in mountain biking in this region, and the appropriate topography of the area. This scenario is illustrative of the potential value of opening the forest as an attractive tourist destination, with minimal costs. We assume 60km of commercially developed mountain bike trails. Based on consultation with mountain bike experts, at least 50km of trail is required to make the area attractive to visitors.*

We conjecture that planning, approval, and construction take 5 years, with ongoing maintenance costs. Visits to the region are modelled to commence 1-year after construction finishes, with visitor numbers increasing over 5-year ramp-up period. For all visitors to the trail, we recognise the social benefit from increased health and activity. Additionally, we assume that tourists will provide additional revenue to the region.

Employment impacts

• *Recreation and tourism: It would be expected that there would be jobs created in recreation and tourism. By means of an illustrative example, Derby in the North East of Tasmania has created around 100 part-time and full-time jobs as result of becoming a mountain biking destination,²⁶ while the Wild Mersey mountain bike development in the north west of Tasmania is estimated to create 51 full-time jobs.²⁷ This analysis included development of a network of mountain bike trails to become a tourism destination and therefore 50-100 recreation and tourism jobs supported may be a reasonable benchmark.*

Koalas

It is generally accepted that koalas have an iconic place in our natural environment and there is strong community support to protect koala habitat. Taxpayer funded conservation programs, especially after the 2019/20 fires already amount to millions and millions of dollars.²⁹

Importantly, koala habitat supports many other species of flora and fauna which require protection if they are to survive in the wild.

The NSW Government³⁰ advises -

Koalas in New South Wales face a range of threats, including habitat loss, fragmentation and degradation, climate change, disease, declining genetic diversity, vehicle strike, bushfire, and dog attack. These mounting pressures, exacerbated by the impacts of the

²⁸ **Comparing the value of alternative uses of native forests in Southern NSW** Frontier Economics and Prof. Andrew Macintosh, ANU | 30 November 2021 <https://www.frontier-economics.com.au/documents/2021/11/comparing-the-value-of-alternative-uses-of-native-forest-in-southern-nsw.pdf/>

²⁹ <https://theconversation.com/morrison-government-spends-50-million-saving-koalas-while-taking-away-their-homes-176370>

³⁰ <https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/programs-legislation-and-framework/nsw-koala-strategy>

Black Summer bushfires, and combined with historic declines, mean that without intervention, koalas could be extinct in New South Wales by 2050.

Taking urgent action, the NSW Government has set an ambitious goal to double koala numbers in New South Wales by 2050.

The Project will produce all of the above threats to local koalas and other wildlife. This creates an unfair burden and financial cost to not only on the regional community, but the State.

The taxpayer is already funding koala habitat protection measures via the NSW Koala Strategy³¹. Planning Priority 6 of the Hunter Regional Plan supports the NSW Koala Strategy³²:

*The Greater Newcastle district supports the Port Stephens and part of the Lower Hunter koala populations. **The Port Stephens population has been identified in the NSW Koala Strategy as a priority for immediate investment and the Lower Hunter population is prioritised to fill knowledge gaps and deliver local actions.***

Natural Capital

The proponents fail to recognise that public land reserved for nature is an economic and environmental asset which fundamentally underpins the essence of our region and guides the way our local economies plan for development.

ACF recently produced a report “The nature-based economy: How Australia’s prosperity depends on nature”³³ that notes -

- *Approximately half of Australia’s GDP (49.3% or \$892.8bn) has a moderate to very high direct dependence on ecosystem services.*
- *Sectors with very high direct dependence on nature – primary industries like agriculture, forestry, fisheries, food product manufacturing, construction and waste and water services – generate \$293.6bn per year, approximately 15.9% of Australia’s GDP.*
- *Sectors with a moderate to high direct dependency on nature – such as mining, real estate, transport and logistics, accommodation and hospitality – contribute \$602.7bn to Australia’s economy, or approximately 33.1% of GDP.*
- *Sectors that have a high or very high direct dependency on nature are responsible for more than three quarters of Australia’s export earnings, with resources currently accounting for 68.7% of Australia’s export share and agricultural exports another 11.3%.*
- *Indirectly, there is not a dollar that doesn’t depend on nature – sectors with a lower direct dependency score still depend upon nature through their value chains, and every worker and consumer needs clean air and water, sustenance, their health and a stable climate.*

³¹ <https://www.environment.nsw.gov.au/research-and-publications/publications-search/nsw-koala-strategy-2022>

³² <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hunter-regional-plan-2041.pdf>

³³ <https://www.acf.org.au/the-nature-based-economy-how-australias-prosperity-depends-on-nature> **The nature-based economy: How Australia’s prosperity depends on nature**, Australian Conservation Foundation report supported by Pollination and Australian Ethical Investments. Economic Analysis provided by IDEEA group 2022 Executive summary

Aboriginal Heritage

The Proponent's conclusion³⁴ that the assessment of archaeological potential the Project Area is deemed to have low archaeological potential across its entirety. Further, the Project is not expected to result in impacts to Aboriginal sites.

Shamefully, the Proponents fail to acknowledge the Project will change the landscape forever. The importance and intrinsic values of Cultural Landscapes³⁵ that *Country is the foundation and the core of all Indigenous cultures, and is integral to all aspects of the lives of Indigenous people*³⁶, is not considered.

It must be noted by decision makers -

*"Damage done to Country significantly affects the wellbeing of Indigenous communities. The deep distress caused by damage to Country impacts Indigenous communities significantly. People are devastated by damage to Country, for their ancestors who reside within, for the negation of their custodial responsibilities to keep culture strong for the cohesion of their communities today, and for the cultural inheritance of future generations. An online survey conducted for this report invited Indigenous stakeholders to express their views on the state of the environment. Overwhelmingly, respondents identified the correlation between the negative impacts on the health of Country and on their own health"*³⁷

The proponent's assessment of Aboriginal Heritage values is clearly biased in favour of the Project.

Climate Change Mitigation

There needs to be recognition that the impacts of climate change are on ongoing and that threatened species and ecological communities will require pre-emptive and flexible management frameworks to allow for appropriate action to mitigate the impacts of climate change.

It means that existing, functioning natural environments should be protected for the environmental services they provide³⁸ as those environments are better able to withstand the impacts of climate change than regenerating sites.

The Proponent's conclude³⁹ that their Scope 1 green house gas emission estimates *"overstate actual net emissions as they do not take into account carbon sequestration associated with biodiversity gains in offset areas"*. However, this statement fails to disclose the fact that in the real world, such offsetting has not offset biodiversity losses from the impacts of development.⁴⁰

³⁴ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-10432%2120230601T023940.308%20GMT> Aboriginal Heritage

³⁵ <https://www.environment.nsw.gov.au/resources/cultureheritage/commconsultation/09783factsheet2.pdf>

What is Aboriginal Cultural Landscape?

³⁶ <https://soe.dcccew.gov.au/heritage/environment/indigenous-heritage> Indigenous Heritage

³⁷ <https://soe.dcccew.gov.au/heritage/environment/indigenous-heritage> Country

³⁸ <https://www.environment.nsw.gov.au/get-involved/sydney-nature/benefits-of-nature>

³⁹ **6.4.5 Greenhouse Gas Assessment** Stone Ridge Quarry Project Assessment and Mitigation of Impacts 4158_R06_Stone Ridge EIS_Final

⁴⁰ <https://www.audit.nsw.gov.au/sites/default/files/documents/FINAL%20-%20Effectiveness%20of%20the%20Biodiversity%20Offsets%20Scheme.PDF> **Effectiveness of the Biodiversity Offsets Scheme Performance Audit** 30 August 2022 New South Wales Auditor General's Report

The Hawkesbury to Barrington Climate Corridors Alliance Report⁴¹ released in December 2022, identified their designated climate corridors will function as "climate refugia" for existing species as well as those areas necessary for wildlife to move as the climate changes. *"If we wish to minimise native species' extinction, climate refugia and identified Climate Corridors must be legally protected."* The Wallaroo State Forest is included in their climate corridor mapping.

The World Meteorological Organisation recently stated that we must be prepared now for a surge in global temperatures, disruptive weather and climate patterns with the onset of El Nino conditions⁴². As well as destroying and altering intact areas of high conservation, the project will remove provision for climate change refugia for wildlife now and in the future

ENVIRONMENTAL IMPACTS

Independent environmental studies should be conducted prior to development consideration and made publicly available. No scientific data has been provided from Forestry Corporation NSW (as the current managers of the public land) to support or validate the proponent's studies. Further, the notion that establishment of biodiversity offset areas within Wallaroo State Forest to compensate for biodiversity impacts⁴³ of the Project needs explanation and justification.

The 2019 Natural Resource Commission's Report⁴⁴ advised that biodiversity was at risk in 11 out of 13 regions in NSW – including the Hunter region. The Project by its nature will cause impacts outside of the project footprint which will add to the demise of the regional koala population and potentially destroy the ecosystem services provided by the Wallaroo State Forest. The quarry proposal is located in the Newcastle Hinterlands district map, Figure 35 and the Barrington district map, Figure 37 Biodiversity Corridor Networks of the Hunter Regional Plan 2041.⁴⁵

Wildlife corridors⁴⁶ are critical areas of land to protect because they –

- *Allow the movement of birds, reptiles, mammals, frogs, invertebrates, plant seeds and fungal spores.*
- *Provide habitat for migratory and resident wildlife.*
- *Provide refuge for wildlife that use nearby limited-value habitat such as open paddocks.*

⁴¹ <https://www.hcec.org.au/climate-corridors#:~:text=The%20Barrington%20to%20Hawkesbury%20Climate,in%20face%20of%20climate%20change.%E2%80%9D>

⁴² <https://theconversation.com/its-official-australia-is-set-for-a-hot-dry-el-nino-heres-what-that-means-for-our-flammable-continent-209126> The Conversation "It's official: Australia is set for a hot, dry El Niño. Here's what that means for our flammable continent" **Kevin Tolhurst AM** Hon. Assoc. Prof., Fire Ecology and Management, The University of Melbourne July 5 2023

⁴³ **1.4 Impact Avoidance** Stone Ridge Quarry Project Introduction 4158_R06_Stone Ridge EIS Final 5

⁴⁴ https://drive.google.com/file/d/1aYqKtF7A9JrHyrOWCjPF_4nZoQPHZkE8/view **Land Management and biodiversity conservation reforms Final Advice on a response to the policy review point** July 2019 Cabinet in Confidence Natural Resources Commission

⁴⁵ <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hunter-regional-plan-2041.pdf>

⁴⁶ <https://www.lfwseq.org.au/wp-content/uploads/2016/11/Wildlife-Corridors.pdf>

- Allow species to re-colonise patches of vegetation.
- Enable the exchange of genes between wildlife populations and reduce the possibility of inbreeding.
- Maintain species richness at patch and landscape scales.
- Can help maintain ecosystem processes such as pollination.

Habitat loss and fragmentation are the two main contributors to continuing biodiversity decline across the landscape. When native vegetation is cleared, fragmented patches or islands of vegetation are created resulting in the isolation of many plant and animal species. This in turn reduces the viability of ecosystems and the populations of species within them. Ultimately, this can result in severe biodiversity decline and local extinctions. Taking a landscape view across both public and private lands can highlight where wildlife corridors are required to reconnect fragmented patches of vegetation.

The Proponents note⁴⁷ the subject land is part of a larger “habitat patch” of regional fauna corridor and is surrounded by large areas of intact native vegetation within the Wallaroo State Forest, with direct connection to Wallaroo National Park, Karuah National Park and Karuah State Conservation Area.

The removal of vegetation and associated impacts on fauna habitat are an inevitable consequence of the Project. Compounding that loss, the final landscape of Wallaroo State Forest will not serve the ecosystem functions it serves today –

Rehabilitation and Final Landform:

*The overarching objective for the site is that the final landform is safe, stable and non-polluting having regard to the proposed end land use for the site and surrounding areas. Rehabilitation at the quarry will address the long-term stabilisation of both quarried and disturbed areas, including rehabilitation of the upper quarry benches and available areas within and surrounding the quarry pit, **with two final voids (Main Pit and North Pit) to remain after closure as water storages.** All final landform slopes (including retained highwalls) will be assessed for long term geotechnical stability having regard to the risk profile presented by the final landform and potential access to the site. **It is anticipated that all operational water storages will be decommissioned, and the landform outside of the Main Pit and North Pit will be shaped to be free draining. All infrastructure not required by FCNSW for post-closure land uses will be removed.***

There just is not the scientific evidence to support the Proponent’s claim⁴⁸ that connectivity and biodiversity values currently in place can be reestablished. Certainly, biodiversity gains are not anticipated⁴⁹ in the immediate future.

⁴⁷ 3.2.3 Habitat Connectivity EIS

⁴⁸ BIODIVERSITY MATTERS OF NATIONAL ENVIRONMENTAL SIGNIFICANCE REPORT Stone Ridge Quarry Project FINAL September 2022 **6.1.1 Impacts on Connectivity**

⁴⁹ <https://www.iucn.org/resources/issues-brief/biodiversity-offsets#:~:text=Biodiversity%20offsets%20are%20only%20appropriate,biodiversity%20when%20projects%20take%20place>. The aim of offsets is to **achieve No Net Loss (NNL) and preferably a Net Gain (NG) of biodiversity** when projects take place. Measures that are not designed to result in NNL and preferably NG are not biodiversity offsets. **Biodiversity offsets must be a measure of last resort; and in certain cases offsets are not appropriate** and should not be used.

The Project will have significant impact on critically endangered and endangered species that will likely see to the long-term decrease in the size of their populations, no matter the aspirations of their offsetting programs.

Impacts to threatened ecological communities and species within the development footprint include⁵⁰:

- *rusty greenhood (Pterostylis chaetophora)*
- *squirrel glider (Petaurus norfolcensis)*
- *brush-tailed phascogale (Phascogale tapoatafa)*
- *koala (Phascolarctos cinereus)*
- *River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South East Corner bioregions endangered ecological community (EEC) as listed under the BC Act (approximately 1.21 ha)*
- *Subtropical Coastal Floodplain Forest of the NSW North Coast bioregion EEC as listed under the BC Act (approximately 3.91 ha)*
- *the two BC Act listed EECs also meet the listing criteria for the EPBC Act Subtropical eucalypt floodplain forest and woodland of the New South Wales North Coast and South East Queensland bioregions EEC (5.12 ha in total).*

Key findings in the 2021 NSW State of the Environment Report⁵¹ includes “*The number of species listed as threatened in NSW continues to rise. These species are at the greatest risk from threats including vegetation clearing, the spread of invasive species and the mounting impacts of climate change*”.

The project proposal is a direct threat to the viability of these nominated ecological communities and species.

Impacts to Wallaroo’s State Forest biodiversity outside of the development footprint include impacts from fugitive light emissions on adjacent habitat, noise impacts of adjacent habitats, dust impacts on adjacent habitats and weed and feral animal encroachment.

The Proponent has noted there are very low levels of introduced flora species currently present. This fact significantly adds to the value of the existing habitat both within the development footprint and beyond.

TRAFFIC IMPACTS

The Proponent underscores the impact a further quarry development will have on the road network.

The Proponent states their market for quarry product will be for the Lower Hunter, Central Coast and northern Sydney construction materials markets, meaning south bound truck journeys are required involving 334 heavy vehicle truck movements initially heading north.

⁵⁰ **Biodiversity** Stone Ridge Quarry Project Summary 4158_R06_Stone Ridge EIS_Final xi

⁵¹ <https://www.soe.epa.nsw.gov.au/key-findings>

They note that proposed upgrades to the Italia Road-Pacific Highway intersection will improve its safety and reduce delays to the Proponent – but what about the rest of the community?

The general public will have to contend with another 300 heavy vehicle trucks at already potentially dangerous intersections travelling at 100 kph at all hours of the day except Saturday evenings, Sundays and public holidays⁵²

Vehicles (including hundreds of quarry trucks if recent development applications are approved along Bucketts Way) entering and leaving the Highway at Bucketts Way, Twelve Mile Creek and Medowie Road, Ferodale will have difficulty heading north or south on the Highway.

Both intersections currently allow traffic to enter the highway where vehicles are travelling at the designated speed of 100 kph. The potential of over at least 1,300 truck movements (cumulative accounting for recent quarry applications noted in introduction) in the next few years, without adequate infrastructure in place, is potentially disastrous for the general public.

Many tourists visit our regions – bottlenecks during holiday periods already occur at Hexham Bridge, Pacific Highway Koorangang, the roundabout at Heatherbrae, and at the intersections of Bucketts Way and Medowie Road onto the Pacific Highway. It is irresponsible for decision makers to consider quarry developments in isolation⁵³ of the cumulative impacts of other approved or soon to be approved quarry developments.

The Traffic Impact assessment does not reflect the reality of the project contributing to potentially dangerous traffic conditions for other users of the Pacific Highway due to high number of Quarry developments occurring in the region.

CONCLUSION

The proposed quarry development should not be allowed on the publicly owned land of Wallaroo State Forest. The Project jeopardises the conservation of fauna species and ecological communities in direct contravention to Forestry Corporation's operational principles of ecologically sustainable development⁵⁴.

Environmental impacts and loss of biodiversity will be considerable and the landscape will be permanently altered. Offsetting for such loss will not address the fact significant impact to the

⁵² **Hours of operation** Stone Ridge Quarry Project Summary 4158_R06_Stone Ridge EIS_Final ii as above

⁵³ **Traffic and Transport** Stone Ridge Quarry Project Summary 4158_R06_Stone Ridge EIS_Final
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-10432%2120230601T023940.308%20GMT>

⁵⁴ <https://www.audit.nsw.gov.au/our-work/reports/regulation-of-public-native-forestry> **Regulation of Public Native Forestry June 2023 Audit Office of NSW** Executive Summary *Public native forestry is regulated through the Forestry Act 2012, Biodiversity Conservation Act 2016, Protection of the Environment Operations Act 1997 and associated regulations. Under the Forestry Act 2012, the objectives of FCNSW include, where its activities affect the environment, to conduct its operations in compliance with the principles of ecologically sustainable development contained in section 6(2) of the Protection of the Environment Administration Act 1991. This involves the integration of social, economic and environmental considerations in decision-making processes.*

Cultural Landscape of the Wallaroo State Forest and the region. This can be avoided if the Project is refused.

The Port Stephens Community Strategic Plan 2022-2032⁵⁵ identifies key social trends that challenge the veracity of the Proponent's claim that the project has effectively integrated community concerns into their Project planning.

The at-risk Koala population within Port Stephens Local Government Area is identified in the Hunter Regional Plan 2041. The Project is in direct contravention of a key planning priority of that Plan which is to support the NSW Koala Strategy to double the number of Koalas in the wild by 2050. Protection of Koala habitat is a key community value identified in the Port Stephens Community Strategic Plan.

The social impacts of the Project, including traffic impacts, have not been adequately assessed and are significant, including the value the community attaches to the natural capital of their environment.

Importantly, the Proponent has not shown that the Stone Ridge Quarry development is required above the other quarry developments currently and soon to be operating in our region that service the construction industry.

The economic assessment of the Project has not considered the number of alternative economic opportunities that the Project will inhibit if it is approved - now and into the future.

Project approval will deny the community the opportunity to better use the Wallaroo Forest Estate to achieve positive, regional environmental, social and economic outcomes.

The Project should be refused.

Yours faithfully,

Megan Benson

Gloucester Environment Group.

⁵⁵ <file:///C:/Users/megab/Downloads/Community%20Strategic%20Plan%202022-2032-WEB.PDF> **Sustainable development** - is an issue that has been raised repeatedly within our community. Balancing development, planning for the future of the community, visitors to the Port Stephens area along with mitigating the impacts on our natural environment are ongoing considerations as part of the Plan.