

We live in Port Stephens and object to the Stone Ridge Quarry Project, SSD-10432, on multiple grounds:

**The adverse impacts on local biodiversity are too severe and the environmental consequences don't align with environmental objectives in the Hunter Regional Plan**

The quarry is proposed to be in the Wallaroo State Forest which is part of a regional habitat corridor that includes the Wallaroo National Park, Karuah National Park, Medowie State Conservation Area and Medowie Nature Reserve (the KMW group).<sup>1</sup> The environmental benefits of the regional corridor are recognised in the Hunter Regional Plan 2041 and in the National Parks and Wildlife Service (NPWS) Plan of Management for the KMW group:

- Strategy 6.4 in support of Objective 6 of the Hunter Regional Plan states: “Planning proposals should promote enterprises, housing and other uses that **complement the biodiversity, scenic and water quality outcomes of biodiversity corridors.**”<sup>2</sup>
- To ensure the long-term viability of the biological values of the KMW group, the NPWS specifically points out that: “Long-term conservation of biodiversity depends on the protection, enhancement and connection of remaining habitat across the landscape, incorporating vegetation remnants **on both public and private lands.**”<sup>3</sup>

Figure 11 of the Hunter Regional Plan shows the location of the biodiversity corridor through the Wallaroo State Forest:



Similar threatened fauna species were observed at the KMW group of parks and at the proposed quarry site in the Wallaroo State Forest, indicating that the biodiversity corridor is currently working:

- The Koala, Brush-tailed Phascogale, Squirrel Glider, Grey-headed Flying Fox and Powerful Owl were observed or heard on the proposed Stone Ridge quarry site and are also on the list of threatened species observed in the KMW group.<sup>4</sup>
- In addition, Little Lorikeet, Varied Sitella, White-bellied Sea Eagle, Little Bent-wing Bat, Large Bent-winged Bat, Southern Myotis and the migratory Rufous Fantail were all observed or heard on the

<sup>1</sup> EIS BDAR, p. 39 and Figure 3.2

<sup>2</sup> NSW DPE. (Dec 2022). *Hunter Regional Plan 2041*, p 68. <https://www.planning.nsw.gov.au/plans-for-your-area/regional-plans/hunter-regional-plan-2041>

<sup>3</sup> NSW Office of Environment and Heritage. (2016). *Plan of Management: Karuah, Medowie and Wallaroo Group*, p 20. <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Parks-plans-of-management/karuah-medowie-wallaroo-group-plan-of-management-160354.pdf>

<sup>4</sup> EIS BDAR, pp 94 – 101. NSW Office of Environment and Heritage. (2016). *Plan of Management: Karuah, Medowie and Wallaroo Group*, p 10

Stone Ridge site during BDAR surveys;<sup>5</sup> the BDAR also includes a reference to a historical observation for a Spotted-tailed Quoll located in the Wallaroo State Forest, 400 m from the proposed quarry;<sup>6</sup> and further BDAR surveys are still planned for the Barking Owl and Masked Owl.<sup>7</sup>

- In all, twelve threatened fauna species, two endangered ecological communities (EEC) under the BC Act (which also meet the criteria of a listed EEC under the EPBC Act), and one and possibly two threatened orchid species were identified on the proposed Stone Ridge quarry site.<sup>8</sup> The NPWS noted that limited vegetation surveys have taken place to identify and map threatened species and ecological communities in the area, indicating that recent observations recorded in the Stone Ridge Quarry BDAR surveys should be considered significant.<sup>9</sup>
- If approved, the Stone Ridge quarry would permanently remove 79 hectares of native state forest and impact a much broader forested area due to noise, vibration, and groundwater impacts from a large-scale quarry that will be blasting, processing, and transporting rock products over a 30-year period. This is directly adverse, not complementary, to the “biodiversity, scenic and water quality outcomes” of the corridor per the Hunter Regional Plan. By narrowing the corridor and removing habitat, an approval decision would also conflict with the NPWS goal of protecting important biological values in adjacent parks.
- Moreover, the greatest threats to the ongoing survival of the now endangered koala are habitat destruction from tree clearing, death from vehicle strike, and illness in part triggered by increased stress, and the proposed Stone Ridge quarry would contribute to all three:
  - 1) the removal of 79 hectares of forest, including the following koala food tree species – *Eucalyptus tereticornis*, *E. caniculata*, *E. fibrosa*, *E. globoidea*, *E. piperita* and *Corymbia maculata* – and the following koala shelter tree species – *E. resinifera*, *E. siderophloia*, *E. umbra*, *Angophora costata*, *C. gummifera* and *Allocasuarina littoralis*;<sup>10</sup>
  - 2) increased heavy truck traffic on Italia Road with no proposed mitigation actions for the safe passage of koalas; and
  - 3) increased stress from quarry noise and blasting during the day when koalas are typically at rest.
- Taken as a whole, the environmental harm from the proposed quarry is too severe and should not be approved.

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<sup>5</sup> EIS, BDAR, p 101; p 111 – 113

<sup>6</sup> EIS BDAR Appendix B, MNES Report for BDAR, p 45

<sup>7</sup> EIS BDAR, pp 99 – 100

<sup>8</sup> EIS BDAR, p 61; pp 94 – 101; pp 111 - 113; EIS BDAR Appendix B, MNES Report for BDAR, pp 41 – 52. The presence of Rusty Greenhood Orchid, *Pterostylis chaetophora*, was confirmed and additional surveys are planned for Red Helmet Orchid, *Corybas dowlingii*, EIS BDAR, p 36 and p 86

<sup>9</sup> NPWS *Plan of Management: Karuah, Medowie and Wallaroo Group*, p 11

<sup>10</sup> EIS, Appendix 11, BDAR, Table D1.2 Floristic Plot Data. Local native koala food and shelter trees from various sources including NSW Department of Planning and Environment 2022, *Koala habitat restoration guidelines*.

<https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/programs-legislation-and-framework/nsw-koala-strategy/local-government-resources-for-koala-conservation/north-coast-koala-management-area>.

Youngentob, K.N, Marsh, K.F., Skewes, J., *A review of koala habitat assessment criteria and methods*, report prepared for the Department of Agriculture, Water and the Environment, Canberra, November. CC BY 4.0.

<https://www.dcceew.gov.au/environment/epbc/publications/review-koala-habitat-assessment-criteria-and-methods>; Eco Logical Australia 2013. *Lower Hunter Koala Study*. Prepared for Dept Sustainability, Environment, Water, Population and Communities

### **The strategic justification for the proposed quarry does not outweigh the resulting environmental harm**

- The Proponent points to objective 9 of the Hunter Regional Plan to support the strategic justification for taking gravel, crushed rock and aggregates from a state forest to use in construction.<sup>11</sup> However, the Hunter Regional Plan does not specifically promote quarry products as the only source of reliable construction materials - “recycled materials and secondary aggregates created from construction, demolition and excavation” are given equal weight in the wording of the objective.<sup>12</sup>
- Proponent may have rejected alternative quarry sites for their own reasons, but this does not mean the NSW government has no alternatives for sourcing construction materials, including recycled materials which are already being used for road infrastructure.<sup>13</sup> While Proponent contends that there are significant supply-side issues affecting construction projects in the region, we could see no evidence in the EIS about an expected supply shortfall in the region that would justify the environmental harm from a large-scale quarry operating in the Wallaroo State Forest. A cursory look at the Environmental Impact Statements for two major road infrastructure projects mentioned by Proponent in the vicinity of the proposed quarry indicated that construction materials were not likely to become in short supply from the projects and, where feasible, materials would be reused and recycled.<sup>14</sup>
- While the ‘do nothing’ alternative is a common business case term for ‘business as usual’ and implies lack of action, it’s a strange concept to apply to a living forest. Forests have intrinsic value and, especially our publicly held forests, do not need to be repeatedly justified to secure their conservation. However, if we need to put it in economic terms, forests are part of our natural infrastructure. They provide watershed protection and improve soil nutrient and water retention capabilities. They play an important role in “regulating the earth’s climate through the carbon cycle, storing carbon above and below ground and removing it from the atmosphere as they grow ... Forests sequester and store more carbon per hectare than other types of land cover.” Forests also contain the majority of terrestrial biodiversity.<sup>15</sup>
- The EIS BDAR confirms that the proposed quarry location in the Wallaroo State Forest is an intact and regenerating forest. It is unburnt and likely in a planned, natural recovery phase after prior timber harvesting. It is providing refuge for at least twelve species of threatened fauna and connected habitat for countless others. As the forest continues to grow and mature, it will store more and more carbon, contributing to state and federal emission reduction targets. The natural regenerating capabilities of this growing forest will be one less area needing public investment in restoration (i.e., cost avoidance). The forest could also potentially support other economic activities such as passive recreation.
- The natural infrastructure in the Wallaroo State Forest provides essential environmental services to the people of NSW and there should be a high threshold before the permanent destruction of any section is authorised. The justification for a large-scale quarry in this location does not meet this threshold.

In summary, the environmental risks and ecosystem loss from the proposed Stone Ridge quarry are unacceptably high and not outweighed by the strategic justification. Considering these factors in combination, the project does not achieve an appropriate balance to meet objectives for sustainable development under the *Environmental Planning and Assessment Act 1979* and should be refused.

Now is not the time for short-term decisions that would result in long-term environmental consequences.

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<sup>11</sup> EIS, sec 2.2, p11

<sup>12</sup> The full section in the Hunter Regional Plan reads: “NSW needs a reliable supply of construction materials to support continued growth. These include sand and gravel, crushed rock, recycled materials and secondary aggregates created from construction, demolition and excavation.” Hunter Regional Plan 2041, Objective 9, p 87

<sup>13</sup> <https://roads-waterways.transport.nsw.gov.au/assets/events/paving-the-way.pdf>

<sup>14</sup> EIS, Hexham Straights, sec. p 60. <https://caportal.com.au/tfnsw/hexham-straight>; EIS, M1 Pacific Motorway Extension to Raymond Terrace, sec. 5.4.5, p 5.74. <https://caportal.com.au/tfnsw/m1rt/documents-and-notifications>

<sup>15</sup> Eliasch Review. (2008). Climate Change: Financing Global Forests. The Crown. United Kingdom. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228833/9780108507632.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228833/9780108507632.pdf)