

Having reviewed the documentation accompanying the Sancrox Quarry Expansion Project (project ID - # 9946) on the NSW Planning Portal (<https://www.planningportal.nsw.gov.au/major-projects/project/9946>), I am very concerned that the project proposal, and the accompanying reports that are required to be submitted with a proposal of this nature, does not include any consideration of the potential impacts on the rapidly growing Sovereign Hills residential community that is within a 3 – 5 km radius of the Sancrox Quarry.

The project proposal seeks permission to extend quarry operation to become a 24 hour per day / 7 day per week enterprise; and introduce asphalt production, concrete production and concrete recycling. Each of these aspects has a considerable potential to have a negative impact on the quality of life for residents who are part of the Sovereign Hills community.

The extension of the quarry footprint, in relation to its current size, has the potential to have a significant environmental impact, particularly as the proposal seeks to garner permission to remove over 2400 primary and secondary koala food trees. The project reports also point to significant environmental impacts on several flora and fauna species, some of which are listed as endangered.

AREAS OF CONCERN AND OBJECTION

1 *Environmental Impact Statement (EIS) – including scope of proposed works and hours of operation.*

The Hanson proposal seeks to alter hours of operation and functions of work at the site considerably.

The EIS, October 2019 (pages i-ii) highlights the following changes to existing operating conditions:

- A significant expansion of the quarry area – which would have significant impact on local flora and fauna that would be negatively impacted by the Hanson request to purchase an area of Crown Land.

It is proposed to expand the quarry size from 17.18 ha to 48.61 ha and its depth from 14 metres to 40 metres. This has the potential to impact on several native flora and fauna species, have a negative impact on the environment and generate a series of biodiversity issues, including the recognition on page v of the report that the *“final development footprint will involve the following direct impacts to biodiversity:*

- *clearing of 43.1 ha of native forest vegetation, which includes 0.55 ha of the Subtropical coastal floodplain forest Threatened Ecological Community;*
- *loss of hollow-bearing trees, some of which may provide potential roost sites and breeding habitat for a selection of bird, arboreal mammal, reptile and microchiropteran bat species; and*
- *removal of foraging habitat for locally occurring native fauna, in particular for threatened microchiropteran bats species, ground mammals, arboreal mammals and a range of bird species”.*

- The EIS (page vi) does not propose that any of these impacts will be compensated for on a like-for-like, and species specific, basis on an adjacent site, given that the existing site is near a recognised fauna corridor.

The strategies proposed to offset the biodiversity issues do not consider the amount of time that would be required to establish, and maintain until maturity, a replacement planting of the koala food trees, stating a preference for strategies such as:

- Generating available ecosystem credits from a proposed offset site, which would only provide some of the ecosystem credits required – with most of the ecosystem credits required will need to be purchased;
- Purchasing remaining like-for-like ecosystem credits from Credit Register (or approach potential credit sellers through the Expressions of Interest register); or

Purchasing “variation credits” by applying variation rules, which would require an Expression of Interest for the required credits to be published on the Office of Environment and Heritage (OEH) BioBanking “Credits Wanted” register.

None of these measures would provide an effective replacement strategy for the more than 2400 koala food trees that would be removed from the site if the proposal is approved, which would place increased stress on the capacity of local koala populations to regenerate after the recent bushfires which have destroyed approximately one-third of the koalas habitat in the Port Macquarie area.

- Significantly increase the amount of material produced by the quarry – which has the potential to impact negatively on a nearby, and rapidly growing, urban community in terms of noise and air pollution;
- Extend operating hours, from those currently employed, to enable the site to operate 24 hours per day / 7 days per week.

The increase in vehicular traffic, which would be permitted at any time of the day or night, will have a significant impact on a growing residential community – whose nearest residences are within 1.5 kilometres of the quarry.

The extended traffic noise of trucks using the Sancrox overpass bridge, at any given time of day would have a negative impact on the quality of life of nearby residents – significantly raising the potential for residents to have sleep patterns disrupted at night;

- The extension of the quarry’s current operations to include concrete production, concrete recycling and asphalt production – in addition to significantly increased quarry production.

Each of these operations, which under the Hanson proposal would be able to be carried out on a 24 hour / 7 day per week basis will impact on nearby residents in a number of potential ways – including increased dust pollution, noise pollution, sensory pollution from asphalt production, possible sleep deprivation from the proposed new operating hours, and potential health impacts on residents who live within the Sovereign Hills community area.

Sovereign Hills is a rapidly growing residential community and residents live within a three-kilometre radius of the quarry. The quality of life, for all residents, is likely to be negatively impacted if the proposal is approved. Sovereign Hills has developed rapidly over the past four years, including the opening of the \$20 million first stage of a \$100 million town centre precinct on November 23, 2019.

With continued projected growth, and the development of the town centre, the community will be considerably larger in coming years and is well placed to provide a significant proportion of the housing requirements for the projected population growth in Port Macquarie.

It is incongruous for a large residential development and town centre to be negatively subjected to the issues that will be generated by this proposal.

2 Noise and Vibration Impact Assessment – and impact on residents of Sovereign Hills

The Noise and Vibration Impact Assessment (dated August 2019) indicates, on page 2, that *“the closest residence to the site is located approximately 150 m to the south, along Sancrox Road. A number of rural residential residences are also located along Bushland Drive to the south-west of the site, the closest being approximately 650 m to the south-west. Another rural residential residence is located approximately 1 km to the west.”*

This assessment makes no mention of the hundreds of residents of Sovereign Hills who live within a 1.5 to 3 km radius of the quarry and its proposed expansion.

The assessment indicates, on page 2, that it *“is not anticipated that noise impacts will alter significantly”* even though the proposed quarry expansion project will cover a much larger area, is proposing to operate 24 hours

per day / 7 days per week, increase production and add other operations (concrete production, concrete recycling and asphalt production).

The increased scope, scale and methods of operation (including blasting) of the quarry expansion project will have a significant impact on hundreds of people living in nearby residential developments – not only during the construction period but also throughout the extended proposed lifespan of the quarry and its operations.

The assessment concludes that *“sleep disturbance criteria [was] exceeded at a number of receptors to the south of the Project site”* during the assessment period (page 53). However, none of the “predicted construction noise level” receptor sites (indicated on pages 5 and 6 – and referred to in charts on pages 26, 38, 40, 51 and 59-62 of the assessment) to the south were in the Sovereign Hills community – which is to the south of the proposed extended development.

Essentially, the methodology for the assessment has not included, or considered, the potential impact that will occur for hundreds of residents who live in Sovereign Hills; children attending early childhood centres; students attending a large secondary college; or retailers (and their businesses) at Sovereign Place.

3 Quality of Air

The Air Quality and Greenhouse Gas Assessment Report also fails to consider the impact of the extended development and scope of operations on the Sovereign Hills community.

The methodology used in this report gathered data from a series of 45 receptors. As with the Noise and Vibration Impact Assessment Report, none of these receptors were within, or close to, the Sovereign Hills community.

This means that this report has no data to inform decision makers about the possible or potential impact that the proposed concrete production, concrete recycling and asphalt production will have on the quality of air for the hundreds of residents that live in the Sovereign Hills; children attending early childhood centres; students attending a large secondary college; or retailers (and their businesses) at Sovereign Place.

4 Social and Economic Impact Assessment

There are several potential social and economic impacts that do not appear to have been addressed in the Social and Economic Impact Assessment Report. These include:

- The proposed asphalt production plant is being considered for placement on the southern side of the quarry. This places it at its closest possible placement to the Sovereign Hills community.

The Noise and Vibration Impact Assessment Report indicated that that *“sleep disturbance criteria [was] exceeded at a number of receptors to the south of the Project site”* during the assessment period (page 53). If this effect extends to residents in Sovereign Hills, there is likely to be a considerable social impact in terms of disruption of lifestyle and quality of life for residents.

The increased use of the Sancrox highway overpass by trucks, particularly if the quarry and its associated proposes production activities, is likely to have a negative impact on residents and possibly result in sleep deprivation for those who live within 1.5 kilometres of the quarry boundary.

- Residents in Sovereign Hills are also at risk of being affected by sensory pollution from the asphalt production plant due to its location.
- Any adverse effect stemming from the proposed quarry expansion, scope of operations and extended operating hours has the potential to have an economic impact on Sovereign Hills residents when the list their property for sale.

As with each other report required for the submission of the proposal for the expansion of the quarry, the methodology used for the development of the Social and Economic Impact Assessment Report has not included, or considered, the potential impact that will occur for hundreds of residents who live in Sovereign Hills; children attending early childhood centres; students attending a large secondary college; or retailers (and their businesses) at Sovereign Place. This is evident in:

- The list of key stakeholders included in Table 6 of the report (page 20). Lewis Land Group, the company developing the Sovereign Hills precinct is not listed as an “identified interest group” amongst businesses and landholders.

This table includes “nearby landowners and residences” as an identified interest group, yet there is no supporting evidence to indicate that residents living in Sovereign Hills were notified of the project proposal and invited to make a submission.

- Page 21 of the report contains a list of childcare facilities but does not include the childcare facilities in Sovereign Hills, despite these being the closest childcare facilities to the proposed project expansion.
- Page 34 of the report indicates that a “*Community Consultative Committee has been established and one meeting has to date taken place, at which following issues were raised by community representatives: environmental impacts associated with expanded quarry operations, increased dust, potential land acquisition and the future rehabilitation of the site*”.

The list of groups included in the consultation for the development of this committee does not include representatives of the Sovereign Hills community.

Given the potential negative impacts of this development the community consultation aspect does not seem to be very comprehensive as only one meeting had been held as of 14/05/2019 (the date of the report).

- The report makes several economic and social impact conclusions but does not make any reference to the potential impact on the quality of life, and health, for Sovereign Hills residents, businesses, and educational facilities. It does not include any statement addressing the potential negative impact of real estate values for a rapidly growing community which, collectively, has made a significant economic, social and personal investment in the precinct and to the development of Port Macquarie.

5 Environmental Impact

The Biodiversity Report indicates there are seven species of endangered bats identified within the area of the proposed expansion of the quarry.

Page 37 of the report identifies that there is “*an assemblage of 81 threatened species or populations are deemed as potential relevance to the study area. This assemblage consists of 14 plants, 35 birds, 24 mammals, four amphibians, three reptiles and one endangered population.*” This includes 17 species of vulnerable and endangered birds that are likely to use the current area for foraging, hunting and nesting.

The report notes, in Table 9 on page 27, that there are over 2400 koala food trees (1262 Tallowood trees – which are primary food trees and 1215 Spotted Gum trees – which are secondary food trees) within the proposed site development area. Whilst the report has noted limited koala activity, Tallowood trees are a significant food tree for local koalas and Spotted Gum trees are a subsidiary food source for them.

Large and important areas of koala habitat have been destroyed by the recent bushfires in the Port Macquarie area and many koalas have been killed. The biodiverse Lake Innes Nature Reserve has been decimated, creating a significant impact on the capacity of koalas to recover their numbers in this area.

The “retirement” (Biodiversity Report, page 5) of a significant number of koala food trees, in the quarry expansion area and Crown Land that Hanson is proposing to purchase, will place further stress on the capacity of a struggling and rapidly declining koala population to recover after the recent bushfires.

Port Macquarie is a renowned tourist destination and a high percentage of these visitors attend the Port Macquarie Koala Hospital and Billabong Zoo to see koalas. The approval of the expansion and development of the quarry site; increase of hours of operation; expansion of activities to allow concrete production, concrete recycling and asphalt production; and approval of the purchase of an area of Crown Land, will impact significantly the capacity of the local koala population to survive and also impact on the capacity of a number of endangered bat species to survive.

Some of the land surrounding the College Rise area of the Sovereign Hills development, which is within 1.5 to 3 km of the quarry, has designated sections of Environmental Protection Area (EPA) for Koala habitat. One of the covenants for Sovereign Hills is the designation of a specific style of fencing to allow koalas to move throughout the area as they move from one food tree to another – or as young koalas seek a home range.

To allow the removal, or “retirement” of over 2400 koala food trees in the quarry expansion area which is close to an established fauna corridor, without a specific plan to re-establish these trees on a like-for-like and species specific basis, and the sale of an area of Crown Land to Hanson, is highly likely to have a negative impact on our local koalas.

Figure 8 (page 35) of the Biodiversity Report identifies that the expansion of the quarry area will also directly impact a species of “targeted threatened orchid survey tracks”.

The proposed expansion of the quarry area would move it closer to fauna corridors and significant biodiversity links, including:

- A regionally significant biodiversity link (Haydons Creek - a 5th order stream);
- A state significant biodiversity link (Hasting River – a 7th order stream);
- A Subregional fauna corridor; and
- An identified wetlands area on the north bank of the Hastings River.

Whilst each of these areas are within the 1000 ha buffer area of the current quarry area, the proposed size of the area for expansion, increased quarry production and additional operations (concrete production, concrete recycling and asphalt production) will significantly add to the risk of a significant environmental mishap which could then have a major impact on local waterways; fauna corridors; nearby residents, businesses and primary producers.

6 Incorrect link information on State Planning Portal Website

The link below, from the State Planning Portal website shows a location on the central coast, near Peats Ridge. It does not show the correct Sancrox site or the area of proposed development and, therefore, does not allow for the correct identification and location of the site.

<https://www.planningportal.nsw.gov.au/major-projects/projects/search-location?zoom-to-project=SSD-7293>

Before a final decision is made on this project, I believe it is imperative that the social, environmental and potential economic elements of the Sancrox Quarry Expansion proposal be more fully considered and investigated, particularly in relation to the impact it will have on:

- A nearby, and rapidly growing, residential community who have committed to being contributing participants in the Port Macquarie district – which has not been consulted or included in the development of the documentation submitted with the proposal;
- The local environment, particularly the local kola population which has seen one-third of its habitat decimated in the past few weeks; and
- The image of Port Macquarie and its reputation as a tourist destination for people who want to interact with, and learn more about, our natural biodiversity.

The negatives of this proposal appear to disproportionately outweigh that positives that might be gained by Hanson Australia.