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# **OBJECTION TO SUTTON FOREST SAND QUARRY**

**STATE SIGNIFICANT DEVELOPMENT**

**SSD-6334**

**BIRDLIFE SOUTHERN HIGHLANDS NSW**

**December 2023**



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**birds are in our nature**

# **OBJECTION TO SUTTON FOREST SAND QUARRY STATE SIGNIFICANT DEVELOPMENT**

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## **Birdlife Southern Highlands NSW objects strongly to the Sutton Forest Sand Quarry SSD-6334**

### **In summary our objections are:**

- Our primary objection to the 2023 resubmitted proposal is the location of the proposed sand quarry within the Great Western Wildlife Corridor (GWWC)
- GWWC is a NSW State designated wildlife corridor established to protect movement corridors and important habitat.
- The presence of threatened species within the area that would be impacted is reported in the EIS.
- The proposed quarry would further fragment an already extensively fragmented area within the Shire of Wingecarribee.
- The progressive regeneration proposed does not replace all features of the existing habitat, including that used by threatened species Glossy Black Cockatoos, Gang-Gang Cockatoos and the numerous woodland birds recorded at this site.

### **Birdlife Southern Highlands NSW (Birdlife SH) is part of the Birdlife Australia network.**

- The proposed quarry is within our membership area.
- As local birders we have considerable familiarity with local species, including habitat, breeding and conservation requirements of birds in the area.
- Our activities include:
  - Guardianship of the Fitzroy Falls Key Biodiversity Area
  - NSW Save our Species Glossy Black Cockatoo actions
  - Baseline bird surveys at Guula Ngurra National Park
  - Regular surveys within the Great Western Wildlife Corridor, Morton National Park, Greater Blue Mountains KBA.
  - Citizen science input and data collection for all surveys and member outings
  - Partnership with Greening Australia in the Wall to Wollondilly project funded by NSW DPE.

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**Our objections are informed by the following:**

## **1. Great Western Wildlife Corridor**

The GWWC comprises significant remnant habitat linking the Greater Blue Mountains with Morton National Park, NSW.

- Sutton Forest, the locality in which the proposed quarry would be located, is the point where the GWWC is narrowest.
- This specific area is already highly fragmented.
- Fragmentation through land clearing is a known risk to the GWWC and local biodiversity.
- GWWC is in the Wingecarribee Local Environmental Plan.
- Shire of Wingecarribee identifies the GWWC as a "core, regional corridor ... critical for connectivity conservation".
- The extent of habitat loss within the Southern Highlands is extensive and continuing.

## **2. Inconsistencies with NSW Government programs and plans**

Birdlife SH argues approval of the extractive industrial activity proposed is inconsistent with its Threatened Species Program and with the NSW Regional Plan, SE Tablelands. Progressive rehabilitation or conservation areas proposed in the applicant's Amendment Report 2023 still involve removal of habitat used by threatened species, as reported in the 2018 EIS.

Birdlife SH argues retention of existing habitat within known and protected movement corridors is critical. We refer to the Draft South East and Tablelands Regional Plan 2041 Objective 5 *Protect Environmental Assets*:

*The South East and Tablelands Region includes a variety of landscapes ..... Home to 150 threatened plant species, 144 threatened animal species, 40 endangered ecological communities, and 14 critically endangered ecological communities, **the region's planning needs to closely manage and protect the variety and layers of an interconnected ecological system.** p.45*

*Active investment by Saving Our Species, Local Land Services, Landcare and local landholders are addressing [habitat loss], but it will take many decades and considerable funding to increase the extent and condition of environmental assets. p.45*

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*The **retention** and careful management of native vegetation, in particular, those along roads and other **movement corridors** can act as a **critical** and cost effective action in protecting habitat for threatened, endangered and critically endangered species. p.45 [emphasis added]*

### 3. Concerns that Offsets will not adequately protect threatened species recorded during Flora and Fauna surveys and Site Assessment as reported in the EIS.

- Flora and Fauna surveys and assessments were undertaken in September and October 2018 with a significant number of threatened species present.
- The EIS acknowledges that the proposed extractive industry activities will result in loss of habitat of 'several threatened species'.
- Glossy Black Cockatoo feeding within the proposed quarry site were recorded, evidence that mature feed trees are in the area that will be impacted.
- Gang-Gang Cockatoos were recorded.
- Tree hollows, essential for many species including Glossy Black and Gang-Gang Cockatoos were recorded during surveys.
- Threatened species recorded include Hooded, Scarlet and Red-capped Robin, Varied Sitella.
- Flora and Fauna surveys record the presence of woodland bird species. There is increasing concern that smaller woodland birds are increasingly impacted by habitat loss.
- Flora and Fauna surveys were undertaken in 2012 - eleven years have elapsed.
- Significant impact has occurred within the area from:
  - The 2019-2020 bushfires (Green Wattle Ridge and Morton fires) impacted extensive areas of the GWWC and Morton National Park.
  - Further damage arose during the three subsequent years of La Nina rain events between 2020 - 2022.

The critical importance attached to retaining existine movement corridors rather than relying on rehabilitating other areas becomes even more within the GWWC given the significant impact in this and surrounding areas from bushfire and La Nina.

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**We object to a reliance on offsets for this project for the following reasons:**

- The offset will not replace 60-70 year old habitat with like habitat in the short term
- Significant size tree hollows are only found in trees around 100 years old.
- Many of the threatened species recorded - including Gang-Gang Cockatoos, Glossy Black Cockatoos rely on tree hollows for breeding and mature trees for feeding
- Regent Honeyeaters are dependent on mature trees for feeding – the area is within feeding pathways for this critically endangered species.
- Stated operating timeframe of the quarry is 30 years
- The loss of more than 65 ha of wildlife corridor, plus impact of quarrying, crushing, screening and transport activities will further disturb wildlife, including avifauna.
- Progressive rehabilitation and further rehabilitation in 30+ years will not adequately protect species currently reliant on the GWWC.

**The importance of retaining GWWC, a designated wildlife corridor is paramount and essential to achieve State and Local Government plans and priorities.**

Thank you for the opportunity to provide comment.

Dr N Bloor  
Conservation Officer  
**for Birdlife Southern Highlands NSW**

**2 December 2023**