

4th December 2023

To the NSW State Planning Department,

Re: Objection to the Sutton Forest Sand Quarry

The Sydney Basin Koala Network (SBKN) has been established by the Total Environment Centre (TEC) and WIRES to advocate for the protection and expansion of connected, thriving koala core habitats and corridors across the Sydney Basin Bioregion, including in Wingecarribee. **We are writing to strongly object to this proposal due to its significant impact on koalas, as well as many other threatened species and endangered ecological communities.** That a proposal for a quarry on such a huge tract of prime koala habitat and fauna corridor is even being considered rings alarm bells for their recovery across the state.

After reviewing this proposal we are at a loss as to why the proponent is suggesting this proposal at all, given the ecological importance of this area as part of the recognised **Southeast and Tablelands Regional Plan Corridors**, with evidence of threatened species thriving on the site documented within the proponents own surveys.

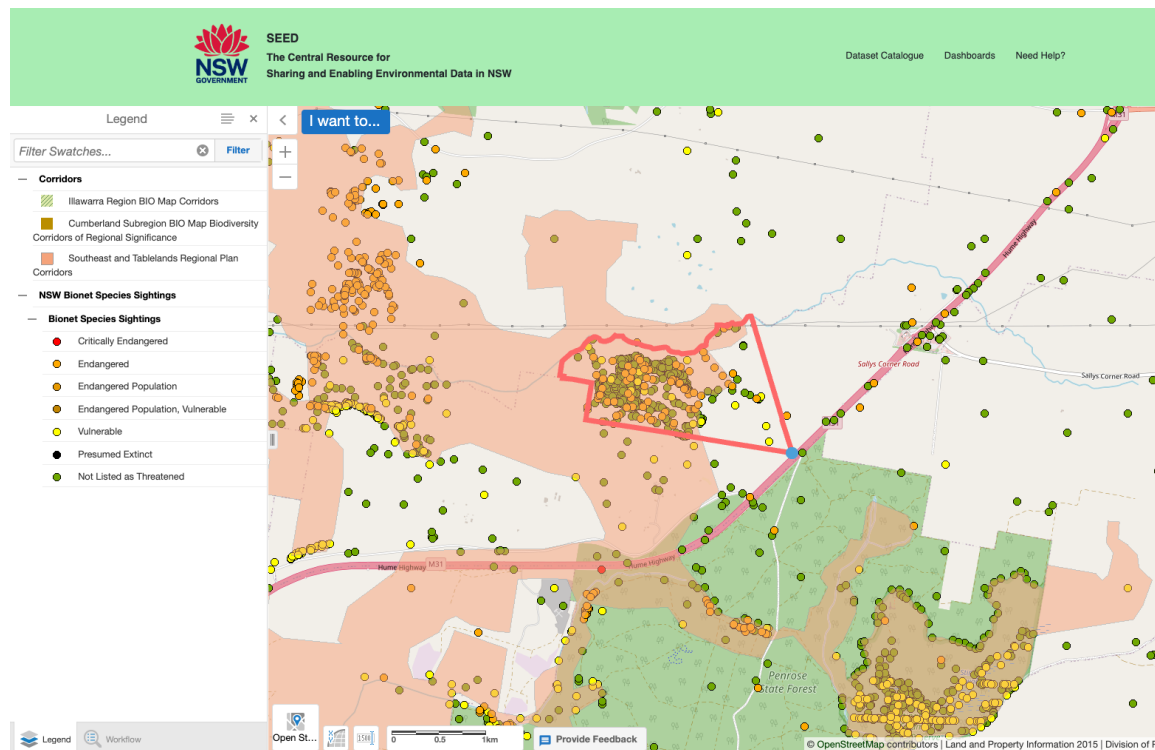


Figure 1. The Quarry Area (red line) is in a fauna corridor (pink) and contains threatened species (orange and yellow dots).



[Southeast and Tablelands Regional Plan Corridors](#) are biodiversity corridors mapped by local experts - “These corridors were mapped by refining **connectivity models for a range of fauna species**, through a process of on ground validation and local knowledge.”

Habitat and habitat connectivity are essential to support the recovery of threatened species. The Koala Habitat Information Base on SEED designates most of the quarry area as **high quality koala habitat** (see Figure 2). With many koala sightings inside the quarry area (Figure 3).

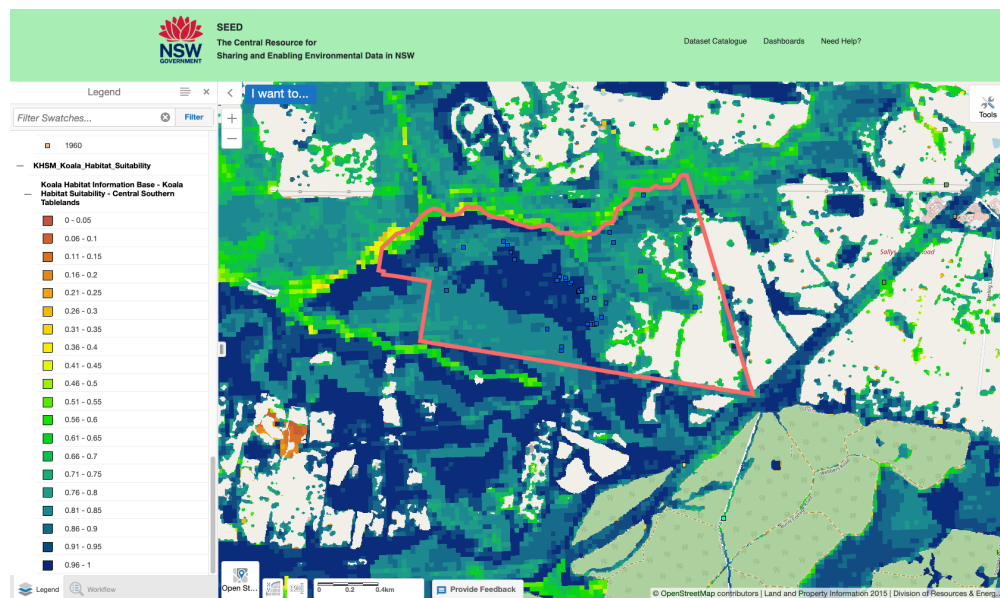


Figure 2. Quarry Area (red line) is on Prime Koala Habitat (dark green and dark blue).

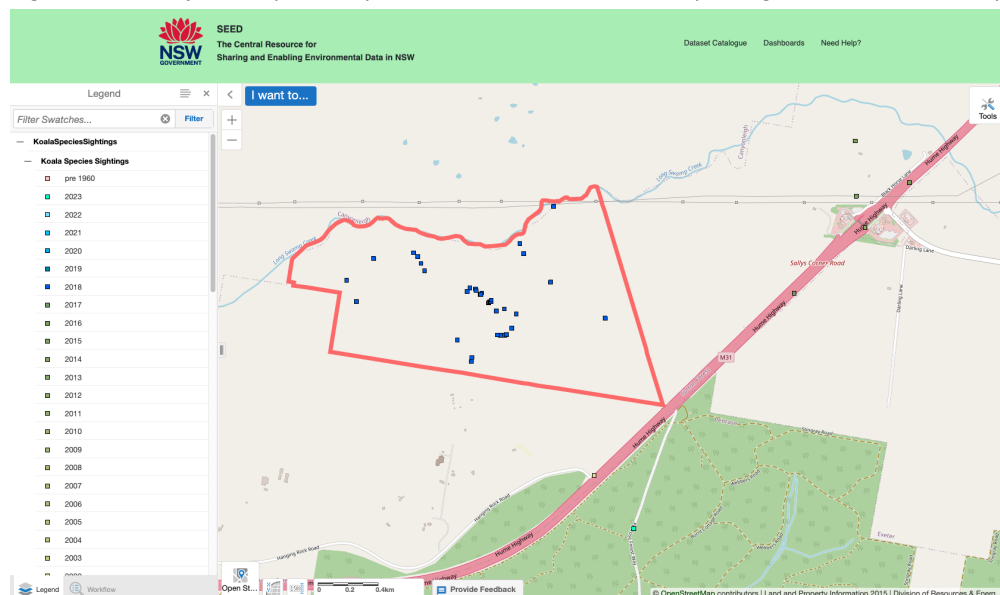


Figure 3. Quarry Area (red line) containing Koala Sightings (coloured squares).

Errors in the Documentation

The proponent's reports incorrectly identifies the status of koalas on multiple occasions:

- The first sentence of the Koala Section (page 40) of the [Submission Report](#) erroneously states ***“The Koala (*Phascolarctos cinereus*) is listed as vulnerable under the BC Act and EPBC Act.”***
- Table 4.4 of the [Submission Report](#) (July 2023) also lists the Koalas as Vulnerable under the BC Act.
- **“Koala *Phascolarctos cinereus* – Vulnerable, BC Act and Endangered, EPBC Act”** - page 2 of the [BDAR](#) (July 2023)

The Koala was uplisted to Endangered under both [BC Act](#) and [EPBC Act](#) in May 2022 and February 2022 respectively. This glaring inaccuracy of a very simple fact and the inconsistencies within the proponent's own reports raises serious concerns about their ability to undertake the more complex task of adequately calculating and addressing their impacts.

Loss of Habitat and Connectivity

Despite recognition that the project area is occupied Koala Habitat, the proponent still wants to **clear 58.26 ha (47.84 ha of which is intact)**. This habitat is part of a recognised wildlife corridor at an already narrow section of the corridor (see Figure 4).

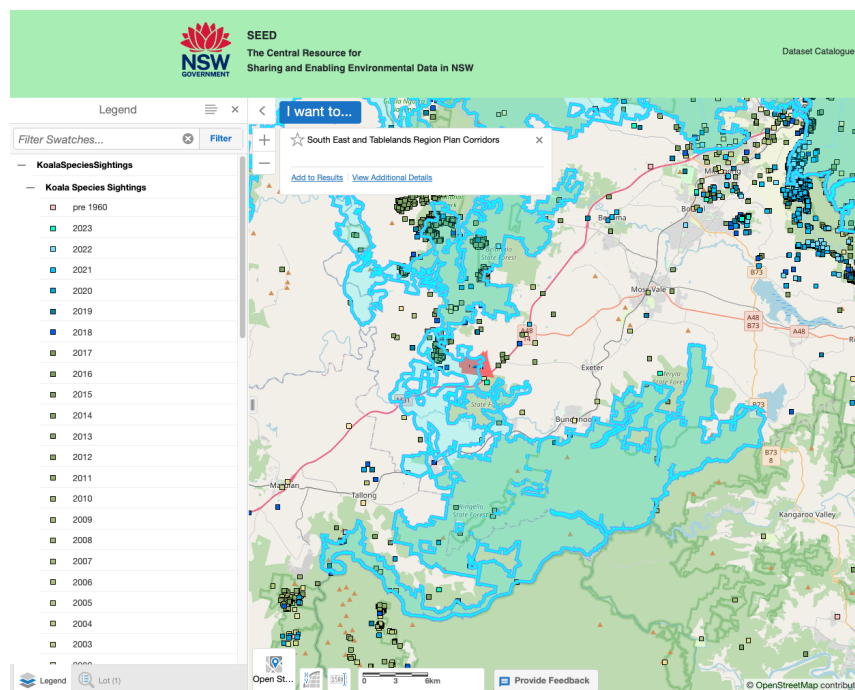


Figure 4. The Quarry Area (red) is being proposed at an already narrow section of the wildlife corridor. (blue).



The proponent themselves recognises the **serious risk this poses to koalas, which are already Endangered in NSW, with habitat loss and fragmentation already a key risk.**

“The removal of vegetation associated with the project will impact upon movement corridors at both the site scale and landscape scale, with impacts to habitat connectivity along Long Swamp Creek and its tributaries as well as to the Regional Wildlife Habitat Corridor (also known as the Great Western Wildlife Corridor (GWWC)). Fragmentation of habitat presents a key risk to the Koala.” page 40 [Submission Report](#) July 2023.

The significant impacts on other endangered animals are also immense. The [BDAR](#) found 3 Threatened Ecological Communities within the subject land and lists 14 Threatened Species found within the subject land. The [Biodiversity Assessment of the Quarry Access Road](#) from 2018 noted there were **44 Threatened flora and fauna species within 5 km of the quarry area.**

Offsets are Inappropriate

“The project is considered likely to significantly impact the Koala as a result of adversely affecting habitat critical to the survival of the species despite all efforts made to avoid and minimise impacts to the species.” - [Submission Report](#) (July 2023).

Instead of avoiding these significant impacts, the project relies on offsets. However the loss of intact native forests where koalas are currently living cannot be reversed, especially when some of the offset is achieved by paying money into a Biodiversity Conservation Fund (page 4. [BDAR](#)). Koalas are territorial and have guts specific to their home range - they cannot simply go somewhere else.

A [report by the Australia Institute](#) on offsets shows that “project approvals and offset plans need to be scrutinised not only by professional ecologists, but by independent, professional ecologists. Economic assessment that is based on proponent-commissioned ecological analysis is likely to understate costs to the community.”

Offsets are not adequate to reverse the impact on a species that is already struggling. We need to say no to habitat loss and fragmentation if koalas are to have a chance of coming off the endangered list.

Other Impacts

The indirect impacts of this proposal are also unacceptable, especially to a koala population already vulnerable to disease. Displacement, noise from works and trucks are almost certain to create an unhealthy amount of stress in already displaced koalas.



Researchers have found a direct link between anthropogenic stress and disease in koalas ([Narayan, 2019](#)), and we would expect this to result in a further decline of this colony. The increased risk of vehicle strikes from an operation with an estimated 94 vehicle movements per day (ES7 [Amendment Report](#)) in such an ecologically important area is another unacceptable impact, when vehicle strikes already pose an increasing threat to koalas.

If we do not take action now, Koalas face extinction in NSW within 27 years (by 2050). The proposed quarry jeopardizes a vital wildlife corridor, impacting koalas and other endangered species irreversibly. The 30-year plan lacks foresight, threatening prime koala habitat and fragmenting the critical corridor. This development has no social license, its cumulative impacts are unjustifiable and can never be adequately offset.

We urge you to reconsider this proposal to protect our precious wildlife. Thank you for your consideration.

Yours Sincerely,
Jade Peace and Stephanie Carrick
Sydney Basin Koala Network.