
EcoNetwork – Port Stephens Inc.

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Melissa Anderson

Environmental Assessment Officer

Resource Assessments

Planning and Environment

GPO Box 39 Sydney NSW 2001

Dear Ms Anderson,

Re: Bobs Farm Sand Mine Project (SSD 6395)

Property: LOT 254 DP753204, LOT 51 DP1015671, LOT 10 DP1071458

3631 Nelson Bay Road, Bobs Farm

EcoNetwork-Port Stephens is a grassroots community-based environmental and sustainability network comprising 28 community and environment groups and eco-businesses with a focus on sustainable planning. We are non-party political and do not donate to political parties.

EcoNetwork would like to express our profound opposition to Ammos Resource Management's application to build a sand mine in Bobs Farm.

We believe the location of the proposed mine is totally inappropriate for Port Stephens, which prides itself on its pristine coastal environment, the prime attraction for growing numbers of tourists and retirees.

Not only will the mine be environmentally destructive within its boundaries, it will add to overall habitat fragmentation, increase heavy truck movements that will compromise road safety, create stress among Port Stephens road users and over time disproportionately add to road degradation.

The proposal is to gouge 750,000 tonnes of sand a year over 15 years from above and below the water table, from a resource of 10 million tonnes, in an area of old growth forest on ancient sand dunes. Forested sand dunes provide stability, protection from storm and wind and a living environment. All of this will be destabilised.

An environmental debacle

The NSW Scientific Committee, established by the Threatened Species Conservation Act, has determined that clearing of native vegetation is a key threatening process, contributing to,

among other negative impacts, loss of biological diversity, loss of local populations of individual species, fragmentation of habitat, expansion of dryland salinity, riparian zone degradation, loss or disruption of ecological function and changes to soil biota (<https://www.environment.nsw.gov.au/determinations/ClearingNativeVegKTPListing.htm>).

Yet what is proposed is the removal of approximately 25.90 hectares or 64 acres of key habitat, an area equal to 62 soccer fields. As an individual project, this mine is environmentally destructive enough, but as part of state-wide unrelenting encroachment on native habitat through logging, mining and other types of land clearing, it will add in no small way to overall habitat fragmentation. The Scientific Committee says fragmentation – the process by which initially contiguous areas of habitat are separated into smaller areas – results in the creation of small isolated populations with limited gene flow between populations, leading to inbreeding depression, and reduced potential to adapt to environmental change.

In attempting to defend the indefensible, the EIS in many respects undermines its own justification by revealing the extent of environmental damage proposed.

The EIS says the study area forms part of a significant ecological corridor that runs down the coast from the Tomago Sandbeds in the south along the Stockton Bight to the Tomaree Peninsula in the north. It says further that the proposal will result in the reduction in the width of the corridor on the western side of the dual carriage way of Nelson Bay Road by approximately 540 metres at its widest point.

Dry Sclerophyll Forest in the form of Coastal Sand Smooth-barked Apple Blackbutt occupies 35.83ha of the study area, which would provide suitable habitat opportunities for a variety of species. Furthermore, the 'large number' of hollow-bearing trees would provide nesting and roosting sites for a variety of avifauna and other hollow dependent species such as arboreal mammals and tree-roosting bats. In fact, a hollow-bearing tree survey identified 1,217 such hollow-bearing trees, *of which 877 will be removed from by the sand mine* (our emphasis) .

As the EIS says, the loss of hollow-bearing trees is a Key Threatening Process under Schedule 3 of the TSC Act 1995.

Progressive revegetation is planned to improve connectivity to adjoining areas, to allow movement of fauna species and that the proposal is *unlikely* to significantly impact the integrity of the ecological corridor. We disagree, as revegetation will take years and, like mineral sands mining conducted during the 1980s may never return the impacted areas to their former ecological soundness.

Artificial lake

Excavation and dredging that will create an artificial lake within the ecological corridor 680m at its widest point will, as the EIS itself says, result in a reduction in the function and quality of the ecological corridor. We believe the creation of an artificial lake is also inappropriate because of the risk of destabilising the sand dune system and enabling contamination of the water table. Excavation creates a risk of exposure and oxidation of acidic sulphate soils with acidic run-off into the water table disrupting biodiversity. While the proponent says it will sample and test for acid sulphate soils, we believe the risk of contamination outweighs any benefit of sand extraction.

In what can only be described as fanciful, the EIS proposes that the final landform will have tourism potential with water sports and recreational accommodation, and even accommodate a floating solar farm – all of which would seem to be incompatible with the proponent's plan to rehabilitate for use as native habitat. Regardless, no business case is offered.

Habitat assessment

The EIS identifies the following species as having a **high likelihood** (our emphasis) of occurrence within the study area:

- Varied Sitella. Its conservation status in NSW is 'vulnerable'.
- Koala – overall in NSW populations are in decline (WWF) and sensitive to habitat fragmentation.
- White-bellied Sea Eagle.
- Powerful Owl – conservation status in NSW: vulnerable.
- Squirrel Glider – conservation status in NSW: vulnerable.
- Grey-headed Flying-Fox – conservation status in NSW: vulnerable, with main threat clearing or modification of vegetation.
- Bats (East Coast Freetail-bat, Eastern False Pipistrelle, Little Bentwing-bat, Large Bentwing-bat) – conservation status in NSW: vulnerable.

(A later entry under the heading 'Threatened Fauna' recorded in fieldwork includes the Little Lorikeet).

The EIS also identifies 13 species of reptile and an array of avifauna species 'none of which are regarded as threatened'. They may not be threatened species but their lives will certainly be threatened by the mining process. Given the threat of harm, the precautionary principle should apply, and the proposal withdrawn.

Questionable justification

The EIS' justification for destruction of habitat can be summarised as follows:

1. Extinction unlikely because of the presence of larger adjoining areas of similar habitat
2. Habitat reduction will be incremental
3. There will be progressive rehabilitation of habitat within the extraction area
4. There will be provision for compensatory habitat (offsetting)
5. There will be efforts to reduce noise and artificial lighting
6. There will be removal and non-use of barbed wire

Regarding 1), the real question is the environmental damage this project will cause. While it may not of itself result in extinctions, aggregated with urbanisation and other encroachments it becomes part of the unrelenting pressure on the natural environment. Over the last 200 years in Australia, more than 100 animal and plant species have become extinct. In NSW close to 1000 animal and plant species are at risk of extinction (NPWS).

Regarding 2) and 3), incremental habitat reduction and progressive rehabilitation can be likened to death by 1000 cuts followed by mummification. When vegetation is cleared landscapes are disturbed and ecosystem dynamics are degraded. Destruction of sand dunes risks permanent loss of the original plant community.

Regarding 4), the Biodiversity Offset Strategy proposes to utilise three parcels of land, one adjoining and one part of the proposed sand mine study area, and one at Nerong. However, offset schemes (also known as biodiversity banking) can be problematic. The system is supposed to ensure that the environmental impacts of a project are mitigated off-site on another land holding (a biobank site) on which the landholder manages to either improve or maintain overall biodiversity values. Developers can purchase matching biodiversity 'credits' from the biobank site owner. Unfortunately, this scheme can allow land of significant ecological value to be destroyed – if land of supposed 'equal value' is protected elsewhere. The offsetting process does not necessarily result in net gain. Also, how do you accurately match the impact on biodiversity of a development with the biodiversity of proposed offsets? Finally, there is the question of non-compliance and monitoring once offsets have been negotiated. From an environmental perspective, the system is unacceptable.

In relation to 5), noise and artificial lighting, even reduced, can only add to wholesale ecological destruction caused by sand mining on the proposed scale.

In relation to 6), this should be a given.

Koalas

The proposal goes to great pains to point out that during fieldwork no koalas were directly observed within the study area, although there was evidence of koala activity in the form of characteristic scratches on the trunks of a small number of Swamp Mahogany and Broad-leaved Paperbark. While preferred Koala Habitat (containing Swamp Mahogany) lies outside of the development footprint, nevertheless 25.90ha of Supplementary Koala Habitat will be

removed. Port Stephens Council Koala Plan of Management (CKPoM) states that Supplementary Koala Habitat requires a *high level* (our emphasis) of protection (though less than Preferred Habitat and Habitat Buffers).

We disagree with the EIS conclusion that the proposal is unlikely to have a significant impact on the koala. Again the precautionary principle should apply.

Truck movements

At peak daily demand, up to 200 trucks will be entering and leaving the site – that's 20 inbound and 20 outbound trucks per hour, or one truck every three minutes. The EIS says this will have a low impact on overall daily traffic movements, increasing the annual average daily traffic on Nelson Bay Road from 15,311 to 15,671, increase of 2.3% over existing flows. However, the increase comprises all heavy trucks, with the outbound ones sharing the busy roundabout at Port Stephens Drive with cars to go west. We disagree that the impact on traffic will be low and believe that road safety will be compromised.

Parents dropping off and collecting young students from Bobs Farm School will have to contend with a loaded truck passing the school every three minutes – hardly a safe setting.

Conclusion

The location of this mine is inappropriate for Port Stephens, which pristine environment is its main attraction and needs to be protected. The mine will be environmentally destructive, add to overall habitat fragmentation and create an artificial lake that risks contamination by acidic run-off and destabilisation of the sand dune system. It will increase heavy truck movements that will compromise road safety and cause stress to road users, especially at Bobs Farm School. Given the threats to the natural environment and road safety concerns, the precautionary principle should apply: the sand mine should not be allowed to proceed.

Nigel Dique

Secretary

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<http://www.econetworkps.org>

<https://www.facebook.com/groups/EconetworkPortStephens/>

EcoNetwork - affiliated groups & eco-businesses

National Parks Association (Hunter Branch) Inc.
Native Animal Trust Fund Inc.
Port Stephens Park Residents Association Inc.
Myall Koala & Envir. Support Group Inc.
Pindimar/Bundabah Community Association Inc.
Shoal Bay Community Association Inc.
Soldiers Point Community Group Inc.
South Tomaree Community Association Inc.
Imagine Cruises (Ecotourism accredited)
Wanderers Retreat
On Water Marine Services Pty Ltd
Destination Port Stephens Inc.
Tomaree Bird Watchers
Port Stephens Native Flora Gardens

Port Stephens Koalas Inc.
Tilligerry Habitat Inc.
Soldiers Point/Salamander Bay Tidy Towns Inc.
Mambo Wanda Wetlands Reserves C'ttee Inc.
Ocean & Coastal Care Initiatives (OCCI) Inc.
North Arm Cove Residents Association Inc.
Port Stephens Marine Park Association Inc.
Boomerang Park Action Group Inc.
Mambo-Wanda Wetlands Conservation Group
Salamander Recycling Inc.
Tomaree Residents and Ratepayers Assn. Inc.
Irukandji Shark & Ray Encounters.
Williamstown Residents Action Group Inc.
Marine Parks Association Inc.