7 December 2019

NSW Government Major Project Approvals

Dear NSW government

I wish to lodge an objection to the proposed Sancrox Quarry Expansion Project. My objection is based on the following issues

- 1. The unacceptably high level of CO2 emissions over the project lifecycle
 - a. to what extent does this proposal require the purchase of certified carbon offsets to mitigate high-level carbon emissions?
- 2. The loss of native forest vegetation, adversely impacts unique local biodiversity
- 3. The lack of adequate "equivalence" in the proposed offset area
 - a. a 2:1 offset ratio is not observed
 - of the vegetation associations identified in the project area, two are not included in the proposed offset area and a third is inadequately represent – tallowwood/small-fruited grey gum/dry grassy open forest
 - c. no hollow-bearing trees are recorded in the proposed offset area, but are present in the development area
- 4. The development will likely remove medium to high activity/core koala habitat
- 5. There will be destruction of an identified critical link needed to maintain vegetation connectivity for animal movement
- 6. The development will divert a native flora and fauna watercourse to industrial use
- 7. Identified Aboriginal heritage sites will be adversely impacted, including a Scar Tree and ceremonial site of "high cultural significance"
- 8. Potential significant local noise pollution from proposed 24/7 operations.

I have not spelt out these issues in forensic detail with supporting references, as I am aware that other submissions similarly objecting to this development have done so.

In closing I wish to make two further points, very important for your consideration.

First, I believe that in considering this application the government should be cognizant of

- what is actually being produced not only the industrial output, but the associated environmental impacts/costs
- the purpose to which the plant output will be used for (road base?)
- the extent to which lower impact eco-friendly alternatives may be utilised for such uses, such as recycled wastes etc that have a potentially lower carbon footprint.

This really is a good opportunity for the government to demonstrate environmental sensitivity with due seriousness in approving such developmental applications.

Finally, I understand that Hanson Construction Materials Pty Ltd were fined \$15,000 in 2016 for breaching the conditions of its Environment Protection Licence at the Sancrox Quarry. While the fine at worst is simply a "business" cost (were the "gains" from this breach ever monetized?) it highlights

- a flagrant disregard for environmental considerations by this business
- an inherent/proven "untrustworthiness" of this business being given approval for further development in this sensitive area.

I trust that you will give these objections due consideration, resulting in acceptable environmental outcomes.

Yours sincerely

Stuart Fitch FAICD FIML