

Attention: Director - Coal and Quarry Assessment
Planning and Assessment
Department of Planning, Industry and Environment
GPO Box 39, Sydney NSW 2001

Re: Public Submission for SSD – 7293, Sancrox Quarry Expansion Project

Dear Sir/Madam,

I submit my strong objection to the above development application.

My objection to the proposal is for the reasons listed below:

1. The Port Macquarie region is expanding rapidly. This development is in the Sancrox area, approximately 6km west of Port Macquarie, which is undergoing significant residential development that will be directly affected by the increased environmental impact of this quarry expansion.
2. The Sancrox area has already had a substantial increase in noise (24/7), due to the upgrading of the highway to a motorway. Despite noise mitigation measures, the rural ambience is already reduced and any extra noise generation, especially at night, will only make it worse.
3. The proposed 'quarry expansion' is more than that! It also includes two new additional operations, concrete batching and asphalt production which should be required to undergo individual Development Applications under Local Government planning instruments. There are already other concrete and asphalt plants in the region that have the capacity to service the demand.
4. The noise impact of a 24 hour, 7 days a week operation is particularly concerning. There will be no respite from constant noisy plant and equipment. Daytime operation excluding Sundays is the maximum that should be allowed in a community precinct. The processes carried out do not have to run at night and can be easily shutdown/restarted.
5. The project includes "clearing 43.1 hectares of native forest vegetation, 0.55 ha of which is identified as the threatened ecological community Subtropical coastal floodplain forest (NR117)" with serious and irreversible environmental impact. (Ref: DA, Annex C)
6. During November 2019 a State of Emergency was declared in NSW due to the catastrophic bushfires. Hundreds of koalas may have been killed. Injured and now homeless koalas may migrate to, or have to be moved onto, the proposed development site.
7. The Greater Sancrox Area Structure Plan (Port Macquarie Hastings Council, 2014), identifies the land to be cleared as medium to high activity koala habitat. More recently the Draft Coastal Koala Plan of Management 2018 (CKPOM) produced by PMHC identifies the area as core koala habitat. The clearing also destroys an identified critical link needed to maintain vegetation connectivity for animal movement.
8. Insufficient field work was conducted in 2015, four years ago. A major flaw of the EIS is that it fails to record koalas at six locations and the presence of habitat critical to the endangered Swift Parrot. (Refs: Office of Environment and Heritage Records, 2008 -2013. Ref. DA Annex C)

9. The environmental impact is serious and irreversible. The proposed development site supports unique biodiversity with a total of 27 threatened species identified so far, including 17 birds and 9 mammals, including 7 vulnerable bats. The native vegetation on site should be retained to combat Australia's abysmal record of extinction of plants and animals in Australia. (Ref. <https://www.environment.nsw.gov.au/topics/animals-and-plants/native-vegetation/why-is-native-vegetation-important>)
10. NSW State of Emergency from bushfire has killed hundreds of koalas other wildlife and destroyed thousands of hectares of bushland across NSW. Therefore the land-value of the proposed site is now exponentially more important to NSW native flora and fauna and the Biodiversity Assessment Report (BAR, Annex C) which was conducted four years ago based on insufficient field work should be disregarded. The BAR is flawed, inadequate and out of date.
11. Proposed "Ecosystem credits" system of payment by the developer to offset destruction of threatened species does not compensate for the serious and irreversible impact on the natural environment.
12. Native vegetation in NSW stores a significant amount of carbon. This deforestation and forest degradation will contribute to global greenhouse gas emissions and fewer trees in a region can contribute to drought by reducing the amount of local rainfall.
13. The natural water on the site, currently supporting native flora and fauna, will be diverted to industrial use and North and west alluvial flood plains of the Hastings River and Haydons Creek will be impacted.
14. The company operating this site has a poor track record of environmental compliance and were fined \$15,000 by the Environmental Protection Authority in 2016 for breaches of their water management operational obligations. (Ref: EPA 24.03.2016).
15. The proposed works impact Aboriginal heritage sites, including a Scar Tree and ceremonial site of "high cultural significance." (Ref: Annex D, Heritage Report)
16. Increased 24/7 heavy vehicle movements on the light duty local roads will compromise road safety and accelerate pavement failure.
17. Rock-fly can be a danger and risk to nearby people, businesses and properties.
18. There has been insufficient consultation on this development. In fact, the documents required for exhibition during SSD 7293 were not available from Port Macquarie Hastings Council for the first two weeks of the initial four week exhibition period, and the wider community was not aware of the meetings, actions or intentions of Community Consultative Committee responsible for this project.
19. A Public Hearing should be called by the Minister to properly and fully assess Community concerns.

Declaration:

I AGREE to the Department publishing my submission on its website in accordance with The Department of Planning, Industry and Environment Privacy Policy.

I have not made any reportable political donations in the last two years.

Signed: Name Withheld