

NAME REDACTED		OBJECT	Submission ID: 216785
Organisation:	N/A		
Location:	New South Wales	Key issues:	Biodiversity, Water resources, Traffic, Air quality, Noise, Other issues
Attachment:	Attached overleaf		

Submission date: 11/21/2024 4:43:28 PM

#### Dear IPC Commissioners,

On 14 November, I attended the Independent Planning Commission's public meeting in Seaham as a concerned resident of Port Stephens and to gain more insight into the proposal in order to write my second submission. I was grateful for this opportunity to hear directly from the applicant and from the objectors. I have a honours degree in Geography and a Masters in Transport Planning. I am now focussed on how developments can coexist with and for communities and the natural environment for an ecologically sustainable future.

I have followed the IPCs public submission guidelines and my comments are below. I have also studied the documentation and submissions on the Stone Ridge Quarry proposal but due to time and space constraints, please note that a lack of reference to any items does not signify approval.

I would ask the Commission NOT to approve the proposed development for the following reasons:

### 1. Individual or cumulative impacts.

The presence of two other quarries in the immediate vicinity of this proposal has already led to undesirable impacts on local communities and the limitations of existing roads, especially Italia Road which is not fit for purpose wrt the number of heavy trucks which already utilise this route. In addition, it is well known that the intersection with the M1 Motorway is hazardous and visibility is restricted. Current sightlines would be unlikely to pass new road construction regulations.

The Applicant considers that the operation of two other quarries in the vicinity, as well as the racetrack(!), as further rationale for a quarry agglomeration here. I respectfully disagree. The cumulative effects of such quarrying activity in one location, is a factor that keeps coming up as a big issue for the community and for the environment.

### 2. Quantify impacts or provide other relevant information or evidence.

In order to quantify some of the impacts that an additional quarry in the area would contribute to and its cumulative effect, I quote from the extensive truck movement research undertaken by members of local community group Voices of Wallalong & Woodville. The Group estimates that based on average production 2,481 trucks could be using the Italia Rd/M1 Motorway intersection per day.

"With the figures of truck numbers in mind we believe the Applicant's statement that 'the modelling suggested that under all three scenarios the interchange would operate at a satisfactory level. Noting the proposal is only expected to generate 30 outbound heavy vehicle movements per hour, the future conditions are expected to perform better than the modelled future scenarios'. We believe that this statement needs to be reviewed with the cumulative effect factored in.

One heavy truck can do as much damage to a road surface as 10,000 light vehicles. How many incidents or accidents do there have to be until a decision is made to address the issue of too many quarry trucks and a road infrastructure not fit for purpose?

Perhaps some believe that sacrificing the lifestyle and health of one community and the local biodiversity for the greater good' is worth it. But even if it was, the benefits in having access to natural resources by destroying



forests and communities must come to an end sooner or later how about looking at alternative materials now? They exist see below.

3. Provide new or unique information or new views on the issues.

The IPC public submissions guidelines suggests that new or unique information or ideas are provided. I doubt that my opinion is new, but to the best of my knowledge this issue was not raised at the Hearing or included substantively in the documentation. A lot has changed in the years since quarrying in Wallaroo State Forest was first proposed, and highly advanced engineering technology is now available to recycle or repurpose construction materials.

Continuing to dig up the earth for finite resources is NOT sustainable. Rock quarrying on such a scale in this location is destroying private, and now potentially state-owned land, which makes it unavailable for other uses. These uses include recreational pursuits for peoples' health and wellbeing, essential protection for biodiversity including several threatened species, and the need to retain trees for carbon storage to assist with NSW and Australia's climate targets. Quarrying would also limit the practice of sustainable timber removal in the Wallaroo State Forest where re-seeding would normally replace the removed trees.

From a sustainability perspective, it is not just the quarry itself, it is no doubt the unsustainable demand of the market. As such, we have altered our environment through all this blasting, digging and hauling.

The applicant has reiterated that rock demand for infrastructure projects is currently exceeding supply. Surely then, there is something wrong with the process? Yes we are in the midst of an infrastructure boom and it is unsustainable.

The Stone Ridge EIS notes that the Hunter Regional Plan specifically identifies the need for a reliable supply of construction materials to support this continued growth including sand and gravel, crushed rock, and aggregates.' (EIS, sec 2.2, p11).

However, if you read the full section, the Hunter Regional Plan reads: "NSW needs a reliable supply of construction materials to support continued growth. These include sand and gravel, crushed rock, recycled materials and secondary aggregates created from construction, demolition and excavation."

So, as the technology exists to manufacture recycled and sustainable materials to use in construction including as concrete substitutes, gravel, roadbase and other aggregates why is the State Government not pursuing these as options for infrastructure project contractors and companies to follow. Like all new technology, it might be a bit more costly for the Stone Ridge Quarry Applicant, but once demand rises, prices will go down. It requires both political will and private enterprises to accept that the time has come to start changing the way in which we construct our roads, tunnels, buildings and other infrastructure. As they have done overseas.

"Road construction materials are a key factor in the environmental impact of transportation. Road construction materials, such as asphalt and concrete, have a large carbon footprint. The use of these materials also increases the risk of runoff, which can contaminate water sources. However, it is possible to build roads using recycled materials such as old tyres, plastic bottles, and recycled or reclaimed materials from disused roads and demolition sites." A Guide to More Eco-Friendly Roads (acbconsultingservices.com)

I am therefore confused as to why the Applicant stated in his ABC Radio interview following the 14 November IPC Hearing that he believed that a balance has been struck to come up with an ecologically sustainable development' for the Stone Ridge Quarry. I disagree and believe a quarry in the Wallaroo State Forest will cause 'irreversible environmental damage', and therefore cannot possibly be accepted as ecologically sustainable.

The Applicant also said that if this site does not go ahead, they will need to look further afield. Does this mean that other locations, not just greenfield, have not already been thoroughly examined? I could not find any



references to specific alternative sites the applicant has investigated. Surely this is, or should be, a standard procedure when evaluating the viability of a preferred location?

As it is difficult to apply monetary values to protection of the natural environment or to the health and wellbeing of the community members impacted, it might be that these considerations appear less important to decision-makers than economic development which is more easily quantifiable. I would request that you take these into account when making your ruling on this matter.

Sacrificing a local community to service the needs of city dwellers and urban infrastructure is not sustainable either.

4. Likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.

Neither at the Hearing nor in documentation, did I hear anything of significance as to the social or economic benefits for this locality. I do not consider the offer of providing materials to fix the walking tracks in the State Forest as relevant. This is a maintenance job that has been neglected, and it is hardly a bonus to offer to do what should be done regularly by Forestry for public and fire safety reasons.

Road and intersection upgrades would need to be permanently in place, before yet another quarry is approved for this area. ie. Not before work on this proposed quarry is undertaken

but before it is approved. Development has to be done in the right order, to avoid future problems rather than deal with them afterwards

There should not have to be another serious motor vehicle accident at the Italia Rd/M1 intersection before a flyover is finally considered as the only option.

5. Suitability of the site for the development.

Despite that state forests are legally available for their resources both above ground and below, I do not consider that this site is suitable for quarrying for the following reasons:

Incompatible land uses. Despite only being a small proportion of the total area of the forest, it would be unpleasant, if not impossible, for the public to use the remaining areas for recreation, nature walks, mountain biking, dog search & rescue trials etc. The close proximity of quarrying operations would generate dust and noise from blasting and truck movements.

Currently the Applicant emphasises that the quarry will be only a small percentage of the Wallaroo State Forest. But it is not unlikely that in years to come, they may apply to extend the size, depth or life of the quarry as is currently the case with nearby quarries. Chipping away gradually at the forest edges will continue until no viable forest remains.

A statement made in the Applicants presentation is incorrect and outdated:

"The project site is mapped as the lowest category 'marginal' habitat on the Koala Habitat Planning Map within the Comprehensive Koala Plan of Management prepared by Port Stephens Council".

The Applicant has not been thorough in his research. Why did he use 20 year old koala mapping from Port Stephens Council as above, instead of the more recent data available in NSW BioNet? We know that BioNet is the more reliable source and indicates that there are other koala preferred food trees present at the Stone Ridge quarry area than those noted under the old Council mapping.

The issue of biodiversity offsets is a complex one and is currently under review for being inadequate in protecting biodiversity, both at state and federal level. The Applicant has stated that



"We have also been engaging with the Forestry Corporation of NSW regarding the identification of biodiversity offset areas. A large area of Wallaroo State Forest will be reserved for conservation purposes and protected as a biodiversity offset for proposed vegetation clearing associated with the Project." July 2022.

I do not accept that a quarry of this magnitude, and a forest intended to protect threatened species, are compatible land uses. An offset should not allowed to protect an area which is unlikely to achieve a net gain.

6. The public interest, which include the benefits of the proposed development and consideration of intergenerational equity and the principles of Ecologically Sustainable Development.

Indeed this is difficult and different. Unlike others nearby, this proposed quarry would be located on public, not private land. I cannot see how it can be in the public interest. I'm afraid of the precedent it will set for the area not just the rest of Wallaroo but other state forests which, reportedly, are not running a profit from the timber. If logging indeed is no longer viable, then it is not in the public's interest that Forestry should turn to the rocks beneath to look for profit.

#### **CONCLUSIONS**

Please consider the above points and apply the Precautionary Principle in denying approval for the proposed Stone Ridge Quarry in Wallaroo State Forest.

It is not in the public interest. Sacrificing a regional community, public road safety and the environment/state forest for recreation/nature for the so-called "greater good" is not how it should work.

Proponent has not done his research thoroughly on koala feed trees, specific alternative site comparisons.

This is a significant decision to be made which if approved, will set a big precedent for Port Stephens and this region.

I am quietly confident that if we can make the right decisions for our future now then, as with renewable energy now powering 40% of Australia's main national electricity grid and set to rise to 80% by 2030, that sustainable materials for infrastructure are the next big thing. Let's give them a chance, and not dwell in the past giving future generations a better chance of surviving the climate crisis.

Dear IPC Commissioners,

On 14 November, I attended the Independent Planning Commission's public meeting in Seaham as a concerned resident of Port Stephens and to gain more insight into the proposal in order to write my second submission. I was grateful for this opportunity to hear directly from the applicant and from the objectors. I have a honours degree in Geography and a Masters in Transport Planning. I am now focussed on how developments can co-exist with and for communities and the natural environment for an ecologically sustainable future.

I have followed the IPCs public submission guidelines and my comments are below. I have also studied the documentation and submissions on the Stone Ridge Quarry proposal but due to time and space constraints, please note that a lack of reference to any items does not signify approval.

I would ask the Commission NOT to approve the proposed development for the following reasons:

# 1. Individual or cumulative impacts.

The presence of two other quarries in the immediate vicinity of this proposal has already led to undesirable impacts on local communities and the limitations of existing roads, especially Italia Road which is not fit for purpose wrt the number of heavy trucks which already utilise this route. In addition, it is well known that the intersection with the M1 Motorway is hazardous and visibility is restricted. Current sightlines would be unlikely to pass new road construction regulations.

The Applicant considers that the operation of two other quarries in the vicinity, as well as the racetrack(!), as further rationale for a quarry agglomeration here. I respectfully disagree. The cumulative effects of such quarrying activity in one location, is a factor that keeps coming up as a big issue for the community and for the environment.

### 2. Quantify impacts or provide other relevant information or evidence.

In order to quantify some of the impacts that an additional quarry in the area would contribute to and its cumulative effect, I quote from the extensive truck movement research undertaken by members of local community group Voices of Wallalong & Woodville. The Group estimates that based on average production 2,481 trucks could be using the Italia Rd/M1 Motorway intersection per day.

"With the figures of truck numbers in mind we believe the Applicant's statement that 'the modelling suggested that under all three scenarios the interchange would operate at a satisfactory level. Noting the proposal is only expected to generate 30 outbound heavy vehicle movements per hour, the future conditions are expected to perform better than the modelled future scenarios'. We believe that this statement needs to be reviewed with the cumulative effect factored in.

One heavy truck can do as much damage to a road surface as 10,000 light vehicles. How many incidents or accidents do there have to be until a decision is made to address the issue of too many quarry trucks and a road infrastructure not fit for purpose?

Perhaps some believe that sacrificing the lifestyle and health of one community and the local biodiversity for the 'greater good' is worth it. But even if it was, the benefits in having access to natural resources by destroying forests and communities must come to an end sooner or later – how about looking at alternative materials now? They exist – see below.

# 3. Provide new or unique information or new views on the issues.

The IPC public submissions guidelines suggests that new or unique information or ideas are provided. I doubt that my opinion is new, but to the best of my knowledge this issue was not raised at the Hearing or included substantively in the documentation. A lot has changed in the years since quarrying in Wallaroo State Forest was first proposed, and highly advanced engineering technology is now available to recycle or repurpose construction materials.

Continuing to dig up the earth for finite resources is NOT sustainable. Rock quarrying on such a scale in this location is destroying private, and now potentially state-owned land, which makes it unavailable for other uses. These uses include recreational pursuits for peoples' health and wellbeing, essential protection for biodiversity including several threatened species, and the need to retain trees for carbon storage to assist with NSW and Australia's climate targets. Quarrying would also limit the practice of sustainable timber removal in the Wallaroo State Forest where re-seeding would normally replace the removed trees.

From a sustainability perspective, it is not just the quarry itself, it is no doubt the unsustainable *demand* of the market. As such, we have altered our environment through all this blasting, digging and hauling.

The applicant has reiterated that rock demand for infrastructure projects is currently exceeding supply. Surely then, there is something wrong with the process? Yes we are in the midst of an infrastructure boom – and it is unsustainable.

The Stone Ridge EIS notes that the Hunter Regional Plan 'specifically identifies the need for a reliable supply of construction materials to support this continued growth including sand and gravel, crushed rock, and aggregates.' (EIS, sec 2.2, p11).

However, if you read the full section, the Hunter Regional Plan reads: "NSW needs a reliable supply of construction materials to support continued growth. These include sand and gravel, crushed rock, recycled materials and secondary aggregates created from construction, demolition and excavation."

So, as the technology exists to manufacture recycled and sustainable materials to use in construction including as concrete substitutes, gravel, roadbase and other aggregates – why is the State Government not pursuing these as options for infrastructure project contractors and companies to follow. Like all new technology, it might be a bit more costly for the Stone Ridge Quarry Applicant, but once demand rises, prices will go down. It requires both political will and private enterprises to accept that the time has come to start changing the way in which we construct our roads, tunnels, buildings and other infrastructure. As they have done overseas.

"Road construction materials are a key factor in the environmental impact of transportation. Road construction materials, such as asphalt and concrete, have a large carbon footprint. The use of these materials also increases the risk of runoff, which can contaminate water sources. However, it is possible to build roads using recycled materials such as old tyres, plastic bottles, and recycled or reclaimed materials from disused roads and demolition sites." A Guide to More Eco-Friendly Roads (acbconsultingservices.com)

I am therefore confused as to why the Applicant stated in his ABC Radio interview following the 14 November IPC Hearing that he believed that a balance has been struck to come up with an 'ecologically sustainable development' for the Stone Ridge Quarry. I disagree and believe a quarry in the Wallaroo State Forest will cause 'irreversible environmental damage', and therefore cannot possibly be accepted as ecologically sustainable.

The Applicant also said that if this site does not go ahead, they will need to look further afield. Does this mean that other locations, not just greenfield, have not already been thoroughly examined? I could not find any references to specific alternative sites the applicant has investigated. Surely this is, or should be, a standard procedure when evaluating the viability of a preferred location?

As it is difficult to apply monetary values to protection of the natural environment or to the health and wellbeing of the community members impacted, it might be that these considerations appear less important to decision-makers than economic development which is more easily quantifiable. I would request that you take these into account when making your ruling on this matter.

Sacrificing a local community to service the needs of city dwellers and urban infrastructure is not sustainable either.

4. Likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.

Neither at the Hearing nor in documentation, did I hear anything of significance as to the social or economic benefits for this locality. I do not consider the offer of providing materials to fix the walking tracks in the State Forest as relevant. This is a maintenance job that has been neglected, and it is hardly a bonus to offer to do what should be done regularly by Forestry for public and fire safety reasons.

Road and intersection upgrades would need to be permanently in place, before yet another quarry is approved for this area. ie. Not before *work* on this proposed quarry is undertaken – but *before* it is approved. Development has to be done in the right order, to avoid future problems rather than deal with them afterwards

There should not have to be another serious motor vehicle accident at the Italia Rd/M1 intersection before a flyover is finally considered as the only option.

5. Suitability of the site for the development.

Despite that state forests are legally available for their resources both above ground and below, I do not consider that this site is suitable for quarrying for the following reasons:

**Incompatible land uses.** Despite only being a small proportion of the total area of the forest, it would be unpleasant, if not impossible, for the public to use the remaining areas for recreation, nature walks, mountain biking, dog search & rescue trials etc. The close proximity of quarrying operations would generate dust and noise from blasting and truck movements.

Currently the Applicant emphasises that the quarry will be only a small percentage of the Wallaroo State Forest. But it is not unlikely that in years to come, they may apply to extend the size, depth or life of the quarry as is currently the case with nearby quarries. Chipping away gradually at the forest edges will continue until no viable forest remains.

### A statement made in the Applicants presentation is incorrect and outdated:

"The project site is mapped as the lowest category 'marginal' habitat on the Koala Habitat Planning Map within the Comprehensive Koala Plan of Management prepared by Port Stephens Council".

The Applicant has not been thorough in his research. Why did he use 20 year old koala mapping from Port Stephens Council as above, instead of the more recent data available in NSW BioNet? We know that BioNet is the more reliable source and indicates that there are other koala preferred food trees present at the Stone Ridge quarry area than those noted under the old Council mapping.

The issue of biodiversity offsets is a complex one and is currently under review for being inadequate in protecting biodiversity, both at state and federal level. The Applicant has stated that "We have also been engaging with the Forestry Corporation of NSW regarding the identification of biodiversity offset areas. A large area of Wallaroo State Forest will be reserved for conservation purposes and protected as a biodiversity offset for proposed vegetation clearing associated with the Project." July 2022.

I do not accept that a quarry of this magnitude, and a forest intended to protect threatened species, are compatible land uses. An offset should not allowed to protect an area which is unlikely to achieve a net gain.

6. The public interest, which include the benefits of the proposed development and consideration of intergenerational equity and the principles of Ecologically Sustainable Development.

Indeed this is difficult – and different. Unlike others nearby, this proposed quarry would be located on public, not private land. I cannot see how it can be in the public interest. I'm afraid of the precedent it will set for the area –not just the rest of Wallaroo but other state forests which, reportedly, are not running a profit from the timber. If logging indeed is no longer viable, then it is not in the public's interest that Forestry should turn to the rocks beneath to look for profit.

# CONCLUSIONS

- Please consider the above points and apply the Precautionary Principle in denying approval for the proposed Stone Ridge Quarry in Wallaroo State Forest.
- It is not in the public interest. Sacrificing a regional community, public road safety and the environment/state forest for recreation/nature for the so-called "greater good" is not how it should work
- Proponent has not done his research thoroughly on koala feed trees, specific alternative site comparisons.
- This is a significant decision to be made which if approved, will set a big precedent for Port Stephens and this region.
- I am quietly confident that if we can make the right decisions for our future now then, as with renewable energy now powering 40% of Australia's main national electricity grid and set to rise to 80% by 2030, that sustainable materials for infrastructure are the next big thing. Let's give them a chance, and not dwell in the past giving future generations a better chance of surviving the climate crisis.