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Submission

to

Clarence Valley Council

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on

Proposed quarry development at Boundary Creek Road,

Nymboida

(DA 2014/0024)

Compiled by John Edwards

Scientific Licence No. SL 100126

For the Clarence Environment Centre

Date: 1st March 2014

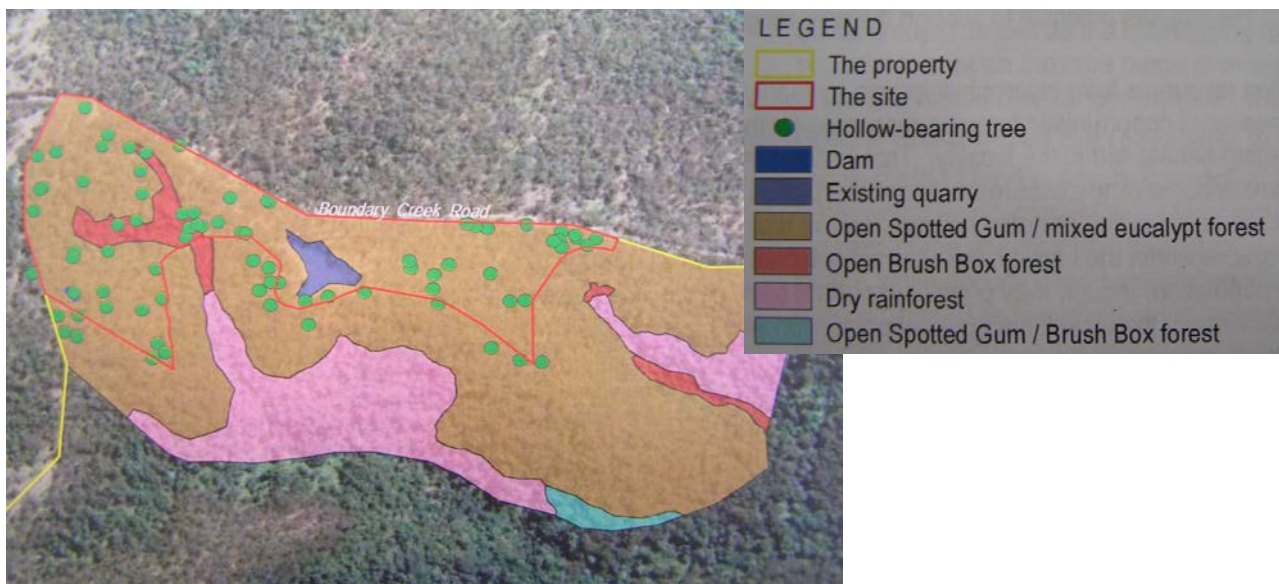
Submission to Clarence Valley Council on the Proposed quarry development at Boundary Creek Road, Nymboida

Introduction

The Clarence Environment Centre (CEC) has maintained a shop-front in Grafton for over 25 years, and has a proud history of environmental advocacy. The conservation of Australia's natural environment, both terrestrial and marine, has always been a priority for our members, and we believe the maintenance of healthy ecosystems and biodiversity is of paramount importance.

Overview

The proposed quarry site on Boundary Creek Road lies along a ridge line that drains to the south via steep gullies into Copes Creek. According to the vegetation mapping undertaken by consultants, Geolink, those gullies and adjacent slopes contain a significant area of endangered Dry Rainforest, and equally high conservation value "open Brushbox forest", while the site itself supports close to 70 hollow-bearing trees.



The proposed quarry area already appears to have an extensive gravel quarry (see Plates 1.1 and 1.4, page 2), the status of which, i.e. whether it is licensed, is unclear, being described as an



"existing stockpile/log dump", explained as, "*currently supporting rural uses*". Clearly it is more than a log dump (see above), and we believe Council should take past activities into consideration prior to approving further expansion.

The Clarence Environment Centre would also like to make the point that this quarry and its acknowledged environmental impacts, would likely not have been proposed if not for the Pacific Highway upgrade. We have long argued that the cumulative impacts of the Pacific Highway upgrade extend far beyond the motorway footprint, yet the Roads and Maritime Services has never been required to consider the cumulative impacts of numerous quarries that have sprung up as a result.

Summary

It has been acknowledged in the Environmental Impact Statement (EIS) that the proposed Boundary Creek Road quarry will have a number of significant environmental and social impacts, as well as the potential for others, including:

- The net loss of some 27 hectares (270,000 square metres) of native vegetation.
- The net loss of habitat for some 30 threatened fauna species, 6 of which were recorded on the property.
- In a high rainfall region, there will be storm water run-off, carrying silt and various pollutants associated with heavy machinery and trucks into Copes Creek. **It should be noted that Copes Creek runs directly into the Nymboida Weir, less than 4km away, the source of drinking water for over 100,000 people living between Iluka in the north and Bonville in the south.**
- The high volumes of heavy trucks over the 25 year life of the quarry, peaking at 100 movements/day, will cause unacceptable damage to the road surface along a 40km stretch of of the Armidale Road.
- The already dangerous Armidale Road will be rendered even more so by the additional heavy traffic. This winding road passes through the villages of Nymboida and Coutts Crossing, both of which have schools fronting the Armidale Road, as does South Grafton. Numerous school buses also use that road, with limited pull-over bays.
- Excessive noise pollution from decelerating trucks, especially at schools. Also blasting will likely cause distress to some neighbours.
- Blasting and continuous mechanical noise will have an major impact on those fauna species currently living in the vicinity, far beyond the quarry footprint.
- A high potential of damage to the Endangered Dry Rainforest community.

Therefore the Clarence Environment Centre does not support the project, unless those impacts are largely eliminated. Best practice mitigation measures the guarantee water quality must be put in place, and independent monitoring and compliance enforcement has to be undertaken.

The Armidale Road must be upgraded and rendered safe for all road users, given the proposed quarry's 25 year life span. Also appropriate off-sets must be provided as detailed below, to mitigate the impact on flora and fauna, including threatened species that will lose critical habitat through the development.

Community consultation

The DA proposes that blasting can be undertaken between 10am and 4pm, 5 days a week, and that there will be as many as 100 truck movements daily. Those truck movements only refer to vehicles carrying the extracted material. The vehicles delivering machinery, as well as those of maintenance crews and employees, are additional, not to mention trucks delivering the estimated 75,000 litres of water needed daily, during dry periods when stored storm water runs out. Yet it is our understanding that, despite these impacts, there has been no prior consultation with affected neighbours.

Off-sets

The suggested “off-setting” of the loss of more than 25ha of native forest by promising to protect an already existing dry rainforest, that the landowner is already required to protect by law, seems a good deal less than ideal – i.e. it results in a net loss of that 25ha of vegetation.

We believe Council must require off-sets, through an area of cleared or degraded land, at least equivalent in size to the proposed quarry, being completely re-vegetated. That land to be properly fenced to exclude livestock. That degree of protection should also be extended to the dry rainforest.

Almost half the land based threatened fauna species on the north coast of NSW are tree-hollow dependent, and are already under threat from loss of habitat. Therefore, to off-set the loss of the 70 hollow-bearing trees, we believe that a minimum 200, good quality fire resistant nest boxes should be expertly installed in adjacent trees to house any displaced fauna.

Rehabilitation

As is generally the case with these types of development applications, we see promises of post extraction rehabilitation and re-vegetation, but the Clarence Valley is riddled with disused quarries; mostly highly degraded, with eroded and weed infested landscapes, with minimal natural regeneration of native vegetation, and are frequently used to dump rubbish.

There is apparently no capacity within Council to monitor compliance, much less enforcement of these conditions. **Therefore, should the project proceed, we believe Council must clearly outline the standard of rehabilitation required, and ensure that the work is carried out, possibly requiring a bond be put aside for rehabilitation works, and allocating a portion of the project application fee to cover the cost of compliance monitoring over the life of the quarry.**

Noise and dust

The Clarence Environment Centre believes that an independent analysis of the noise pollution assessment presented by the proponent should be undertaken, and checks made to ensure proposed mitigation measures will ensure nearby residents are not adversely impacted by dust and noise, particularly at the junction of the Armidale and Boundary Creek Roads where deceleration, braking and acceleration along an unsealed road will likely impose unacceptable impact on residents.

Noise from decelerating trucks, at times as frequent as one movement every 5 minutes, will also have an unacceptable impact on the three schools that front the Armidale Road.

Traffic

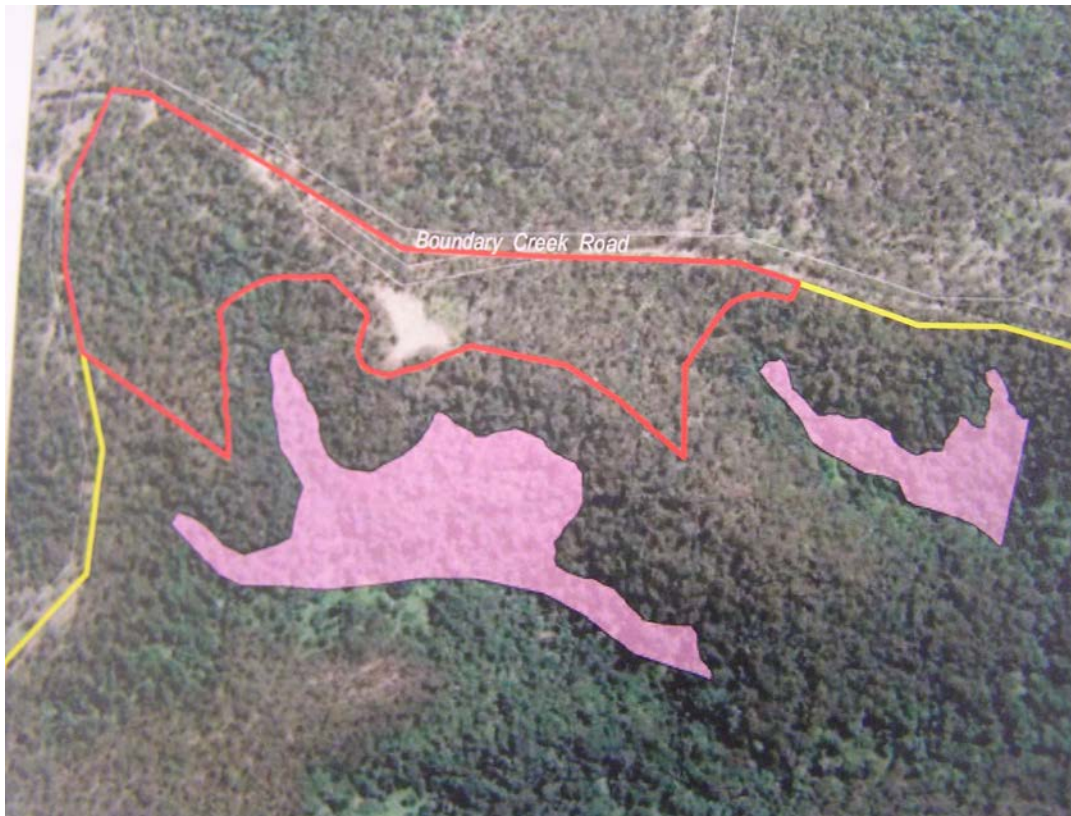
The experience with quarry traffic along the Gwydir Highway has shown that even major highways can crumble under the sheer weight of these heavy vehicles. The sheer volume of trucks generated by the Nymboida quarry (to 100 movements daily), will have a major impact on road surfaces all along the already dangerous Armidale Road from Nymboida to at least the Glenreagh turn off and also into South Grafton.

Council must consider the fact that multiple school buses travel that route, and that three public schools front the Armidale Road, with parents and buses delivering and picking up children.

The entire 40 plus kilometres of Armidale Road from South Grafton to Boundary Creek is narrow, with crumbling shoulders and a surface that resembles a roller-coaster, without a single overtaking lane. Therefore, we believe the road should be upgraded, shoulders widened and strengthened, and at the very least, four strategically placed overtaking lanes constructed for safety purposes before the quarry is approved.

Endangered Ecological Community (EEC)

A significant area of Endangered Dry Rainforest Community lies directly downslope of the proposed quarry site.



The pink areas are the dry rainforest area as mapped in the EIS. Pale green patches adjacent to the rainforest is likely *Lantana camara*, a highly invasive weed and serious threat to rainforest because it is highly flammable and facilitates the introduction of fire into the rainforest verges. The dark green areas might also be rainforest, or otherwise protected old-growth forest.

There appear to be at least 3 or four distinct gully lines that drain directly from the ridge line where the quarry is proposed. Despite the consultant failing to identify any threatened species in those gullies, it is more than likely that one or more do in fact occur. Therefore to protect the EEC from polluted run-off and siltation from the disturbed site, it is crucial that adequate silt trapping be installed and effectively maintained for the 25 year duration of the quarry.

At the same time it is equally important that water run-off is not diverted, thus starving the gullies of their natural flows.

We are also particularly concerned over the placement of the several metres of overburden that has been identified in the EIS. It is crucial that this material is not bulldozed into the rainforest buffer zone, but carefully stockpiled on areas that will be quarried in the future and then retrieved for rehabilitation purposes when the first area is mined out.

We thank Council for the opportunity to comment. **However, we repeat earlier requests that Council require future development applications be made available to the public in electronic form (CD) that can accommodate word searches etc, not scanned documents.**

Yours sincerely
John Edwards (Honorary Secretary).