

5th February 2026

Objection submission re Boral Reedy Creek Quarry – KRA 96

City of Gold Coast Council
Planning Department

Dear Sir/ Madam,

Reference: COM/2025/101,

Lot 105 SP144215, Lot 105 Tallebudgera Creek Road, TALLEBUDGERA VALLEY QLD 4228

Gecko Environment Council Assoc. Inc (Gecko) is lodging an objection to the proposed quarry at Reedy Creek KRA 96, and our comments and reasoning relate only to the Reedy Creek application as the West Burleigh proposal is code assessment.

Introduction

Gecko objected to the previous application by Boral in 2013 for the development of the KRA 96 quarry. On reading this application we find that the changes in this application are minor and do not address the issues raised by the Land and Environment Court judgement in 2017. These issues led to the dismissal of Boral's appeal against the refusal of the application by City of Gold Coast Council (Council). Subsequently Boral appealed the decision to the Supreme Court. This was the decision: - *"On 20th April 2018, the Supreme Court ruled against Boral's appeal, upholding the GCCC's decision. The court found that Boral's arguments for the quarry did not sufficiently address the environmental and community concerns raised during the application process."*

It is our view that this 2025 application should also be refused by Council as the application remains in conflict with the 2016 Planning Scheme and the environmental and community concerns.

It is evident that the development of the quarry at Reedy Creek will result in permanent and irreversible changes to the ecosystem on the property to the detriment of the native flora and fauna and the functioning of the Burleigh to Springbrook Hinterland Critical Corridor (HCC).

Referral to the EPBC Unit: It is also of concern that the Boral Company have failed to refer this latest application to the Environment Protection Biodiversity Conservation unit for assessment, to reflect the changed status of the koala from Vulnerable to Endangered. Further the Glossy Black Cockatoo listed as Vulnerable under the EPBC Act, is known to inhabit the site. The previous referral decision is no longer relevant.

No economic need: Further it is our view that there is no need for the development of the quarry as there is sufficient similar resources elsewhere on the Gold Coast. The Court judgement 2017 stated – *"The earliest that there might be a supply issue, and therefore a more*

pressing need for an additional hard rock quarry, would be at or about 2031, but more likely at or about 2040." Evidence outlined in this submission demonstrates the need to conserve and restore the ecological functions of this site to support the HCC. By the time 2040 arrives this will be critical.

Comparison of the 2013 Proposal vs Current Proposal 2025

Feature	2013 proposal	2025 proposal	Change
Key resource area	KRA 96	KRA 96	No change
Extraction area	65ha 30% of site	56.4 %ha 26% of site	Small reduction
Annual production	2.0 million tonnes	1.2 million tonnes	40% reduction, but rest of resource remains for future extraction
Operational life	40-60 years	40 years	Little to no change
Loss of koala habitat trees	23,247 trees	9,668 trees	Reduction but still a prescribed activity
J Ridge removal affecting scenic amenity	To be removed	To be removed	No change
Truck movements	400 movement per day	400 movements per day	No change
Hinterland critical corridor	Direct impact	Direct impact on 52 ha	Indirect impact remains on entire site
GC City Plan 2016	Relevant	Relevant	No change

Boral has made only **small modifications** to their rejected 2013 proposal:

Failure in stewardship of the Land:

Boral has owned the property since 2005 but has not demonstrated the ability to care for the land in which the KRA 96 is situated. They have allowed degradation of the land with weed infestation; multiple bike and vehicle tracks resulting in destruction of native vegetation and fauna habitat as well as causing erosion. They have not cleaned up the rubbish and tyres dumped on the property or arranged supervision of the property to prevent further dumping. They are citing the degraded state of their land as a reason to allow the quarry to proceed. Their lack of stewardship of the land over 20 years provides little confidence that as an operational quarry they will protect and conserve the areas outside of the actual quarry extraction perimeter or ensure that when the quarry material is exhausted there will be appropriate remediation and land will be cared for in perpetuity.

At a Queensland state level, the removal of 9,668 non-juvenile koala habitat trees is a Significant Residual Impact for MNES and MSES and is a prescribed activity in the Nature Conservation Act and Environment Protection Act, Section 6.

Relevant section Significant Residual Impact guidelines state the following and this is relevant to the status of koalas on the Gold Coast and in the HCC in particular: -

Section 5: Protected wildlife habitat

▪ An action is likely to have a significant impact on endangered and vulnerable wildlife if the impact on the habitat is likely to:

- lead to a long-term decrease in the size of a local population; or
- reduce the extent of occurrence of the species; or
- fragment an existing population.
- interfere with the recovery of the species; or
- cause disruption to ecologically significant locations (breeding, feeding, nesting, migration or resting sites) of a species.

Better protection is also needed for the Powerful Owl, and the Tusked Frog also listed as Vulnerable under the Qld Nature Conservation Act

The following City Plan Codes and Maps (SC2.6) are relevant to the company's failure in stewardship: -

Environmental Significance Overlay Code: 8.2.6.2 Purpose (2) (4) demonstrates the inclusion of the Hinterland Critical Corridor (HCC) in this Code and (3) Degraded matters of environmental significance are protected and rehabilitated, and (4) High priority vegetation is protected in situ.

There is no evidence that degraded matters of environmental significance have been protected and rehabilitated. In fact, the opposite is true as Boral have allowed the degradation of the land over 20 years.

SC 2.6 Environmental Significance Overlay Map 14 - biodiversity areas - identifies the quarry site as HCC, substantial remnant and of importance to LMES, while Environmental **significance - priority species overlay map 15** identifies the site as important for koala and MSES and LMES and the **Environmental significance - vegetation management overlay map 15** – identifies the quarry as supporting high and medium priority vegetation. These maps reinforce Gecko's view that this site should be protected from the degradation of a quarry and rehabilitated to improve its ecological integrity.

Changes in Circumstances since 2017

Koalas at serious risk:

Koalas, listed as Vulnerable in 2017, were uplisted to Endangered in 2022 under the Environment Protect Biodiversity Conservation Act (EPBC Act). This clearly demonstrates that the koala population of the Gold Coast is in serious decline and cannot tolerate loss of a crucial habitat and movement corridor.

The environmental studies of the site were undertaken by New Ground in winter and spring in 2024 and autumn and winter in 2025 (*winter period: 4 th – 6 th June 2024 and 1st – 3 rd July 2024; • a spring period: 8 th – 31st October 2024; and • a late autumn – mid winter period (13th – 15th May 2025; 2nd, 9th, 16th, 23rd, 30th June 2025; and 14th, 21st July 2025)*). The survey results for koalas indicated "RCKRA Project site exhibits low / transient use only, with a band of

medium / high usage in the south-eastern area of the RCKRA Project site.” It might be deduced from this information that the site is not important to the local koala population, however there are many other factors which contribute to koala population health and usage of habitat sites. Transient use is a defining characteristic of movement corridors supporting the natural bioregional movement of koalas, particularly for dispersing juveniles, breeding males, and individuals displaced by fire, disease or habitat loss elsewhere. Removal or degradation of such habitat contributes directly to population fragmentation, reduced genetic diversity and increased disease and mortality.

A decline in environmental health (i.e., habitat disturbance, loss, fragmentation) is identified as the principal driver of disease impacts on koalas¹. Cumulative threats to koalas are resulting in increasing mortality rates of many local populations² (Biolink reports, 2024).

Koalas on the Gold Coast are declining due to loss and fragmentation of habitat, disease particularly Chlamydia, vehicle strike and dog attacks as well as the impact of global warming on food sources, so retention of quality habitat and connectivity is even more important now.

Threat mitigation activities are being co-designed and implemented by a multi-stakeholder Urban Koala Response Group led by the City of Gold Coast, together with initiatives of the City’s Koala Conservation Strategy (2023-2028) and QLD Government’s Koala Conservation Strategy (2020-2025). These include addressing connectivity under Old Coach Rd, vaccination and treatment of disease in targeted koala populations, community education and engagement, and habitat improvement. These costly measures, supported by public funding, a koala levy and community organisations, will be undermined if the quarry proceeds.

Specific impacts on koalas and other fauna:

It can confidently be said that even if koalas are excluded from the actual quarrying area they will be seriously disturbed in the remaining habitat by high levels of noise, nocturnal lighting, dust on vegetation, truck movements and the presence of workers on site.

Cultural impacts:

Threatened species further impacted by this proposed development are also of cultural significance to the local First Nations community. It is unclear if First Nations people are being directly consulted in the consideration of the Boral Reedy Creek Quarry, however Gecko reiterates the right of all parties to access appropriate engagement and free, prior, and informed consent.

Noise impacts:

It is suggested that fauna will move away from noise in their habitat but then later return at the cessation of the noise. Given that there will be blasting every week and noise from machines/ trucks for 10 hours every day, it appears unlikely that fauna will return.

¹ The National Koala Disease Risk Analysis Report (Vitali, et. al., 2023) Accessible: https://wildlifehealthaustralia.com.au/Portals/0/ResourceCentre/BiosecurityMgmt/KDRA%20Report%20v1.2_FINAL.pdf

² Biolink. (2023). Elanora-Currumbin Waters Koala population study 2023. Report to the City of Gold Coast Council by Biolink Ecological Consultants, Pottsville, NSW.

Biolink. (2023). Coomera-Pimpama Koala population study 2023. Report to the City of Gold Coast Council by Biolink Ecological Consultants, Pottsville, NSW.

Vibration impacts:

The New Ground report states that there are few studies of the impact of vibration on fauna so no firm conclusions can be drawn as to the impact of the vibrations from the blasting or constant machinery movements. The lack of data-informed decision making is not acceptable.

Dust impacts:

While it is noted that the crushing operations will be contained within the buildings constructed on site, it is very likely that dust will be generated from the blasting and the moving of the blast rock materials by machinery. The New Ground report advises there are no available studies of the impact of dust on fauna, but the report assumes it would be similar to humans and unlikely to be a problem due to the dust suppression activities. However, this does not resolve the issue of dust resulting from the blast and movement of the rock.

Lighting impacts:

Lighting for activities on site during winter months and security lighting at night has the potential to disturb nocturnal fauna feeding and movement including koala and the Powerful owl.

The conclusion must be made that an operational quarry will have serious deleterious impacts on the remaining koala population of the Hinterland Critical Corridor.

The Hinterland Critical Corridor (HCC) Burleigh to Springbrook

The land in which the KRA96 quarry is situated is part of the HCC and as such forms a vital link for the movement of native animals and birds from the coastal areas to the hinterland, and Springbrook National Park. The disturbance and degradation of this link with a quarry will seriously degrade the ecosystem of the corridor and create an additional barrier to fauna movement despite the retention of a good portion of the site in its current condition.

*The HCC is referred to in the **City Plan Strategic Framework 3.2.4 Theme 5 Living with nature, 3.7.3 Greenspace Network – Strategic Outcome (1)** “A comprehensive green space network of natural landscape areas is enhanced, maintained and protected for the nature conservation and recreation needs of the city and enhances the city’s powerful image of green, gold and blue”. It cannot be said that a quarry in this Greenspace network will enhance or protect the natural landscape.*

3.7.3.1 Specific Outcomes of the Greenspace network states (2)” *The green space network links local and regional green space, including linking matters of environmental significance and extending hinterland to coast critical corridors*”. The quarry disrupts both the environmental significance and the linking function of the greenspace network with the construction and operation of the quarry as well as reducing the usage of the remaining site by native fauna and birdlife due to the impacts of noise, dust, truck movements and presence of humans.

Specific Outcome (6) states that “*The limited commercial uses in the city’s green space network do not compromise the nature conservation, scenic amenity, recreation or other values of the green space network*”. It is clear that a commercial operational quarry will compromise all the values of the greenspace network.

Strategic Framework 3.7.4 Nature Conservation:

3.7.4. (2) (b) In **hinterland to coast critical corridors** that “link core habitat systems and to enhance fauna movement between different ecosystems and landscapes; and Specific outcomes 3.7.4. 3. (a) The city’s matters of environmental significance include: *native vegetation of national, state or local significance*; (d)(i) *hinterland to coast critical corridors, including: (i) Burleigh Heads to Springbrook; and (e) habitat for threatened species, such as koalas*. The Boral quarry application claims to be retaining 74% of the site’s vegetation, though they have clearly stated that they consider this to be in a degraded state, due to weeds, rubbish and bike tracks which they failed to control. They have not made any effort to restore the degraded areas in the 20 years they have owned the site, and it is difficult to have confidence that they may do so in the future. The critical habitat corridor facilitates movement for a high diversity of migratory, nomadic, and threatened fauna species. There is little recognition of the importance of this site as part of the HCC or habitat for the endangered koala or other species. The company has suggested that they may provide an underpass for fauna under Old Coach Rd, however the improvement this might provide for fauna movement will be offset by the large number of noisy trucks with strong diesel emissions. Additional fauna movement systems and strategies through this corridor is already being investigated by other agencies, including the City of Gold Coast.

3.7.4.1.(4.) “In biodiversity areas, matters of environmental significance including vegetation and habitat for native flora and fauna are protected **in situ**, and degraded areas are restored to improve habitat quality and connectivity.” The City Plan is very clear that **vegetation of environmental significance** of which “seven (7) flora species listed as threatened under the NC (Plants) Regulation 2020 were recorded on the RCKRA Project site, including: *Cupaniopsis newmanii*, *Endiandra globosa*, *Leichhardtia longiloba*, *Lepiderema pulchella*, *Rhodamnia rubescens*, *Rhodomyrtus psidioides*, and *Syzygium moorei*,” **must be protected in situ**.

Climate Change potential impacts:

It is evident from the extreme weather Australia, (and Queensland in particular), has been experiencing, that global warming has increased and will be having a negative impact on native flora and fauna. In this scenario an intact ecosystem such as the site for KRA 96 provides is very important for the fauna dependent on the flora for sustenance. The recent National Climate Risk Assessment outlines increasing intensity of rain events and runoff expected for the Gold Coast region as well as longer periods of dry weather. The dry periods are likely to result in less available moisture and nutrients in vegetation for koalas and other fauna, further compromised by dust from the blasting and movement of rock from the blast site to the processing sheds.

Scope 1 emissions will occur with the land clearing of vegetation and operation of the quarry for a period of at least 40 years. Similarly **scope 2** – emissions from use of electricity to power the site will continue for the life of the project though perhaps this will reduce as electricity is increasingly generated by renewable energy. **Scope 3** emissions from the truck movements will continue for the 40 year life of the project unless the company is able to move initially to biofuels and later electric vehicles. However, such a scenario is not mentioned. Boral says only that it will consider offsetting emissions. It is essential that consideration and reduction of climate change impacts is increased to be a requirement should the project be approved.

Population Increase:

The population of the Gold Coast continues to grow with approximately 15000 new residents moving here per year. As more land is cleared for housing, the remnants of native vegetation found in the HCC and adjoining reserves become ever more important in providing habitat for our fauna and retention of native flora.

Impacts on residents:

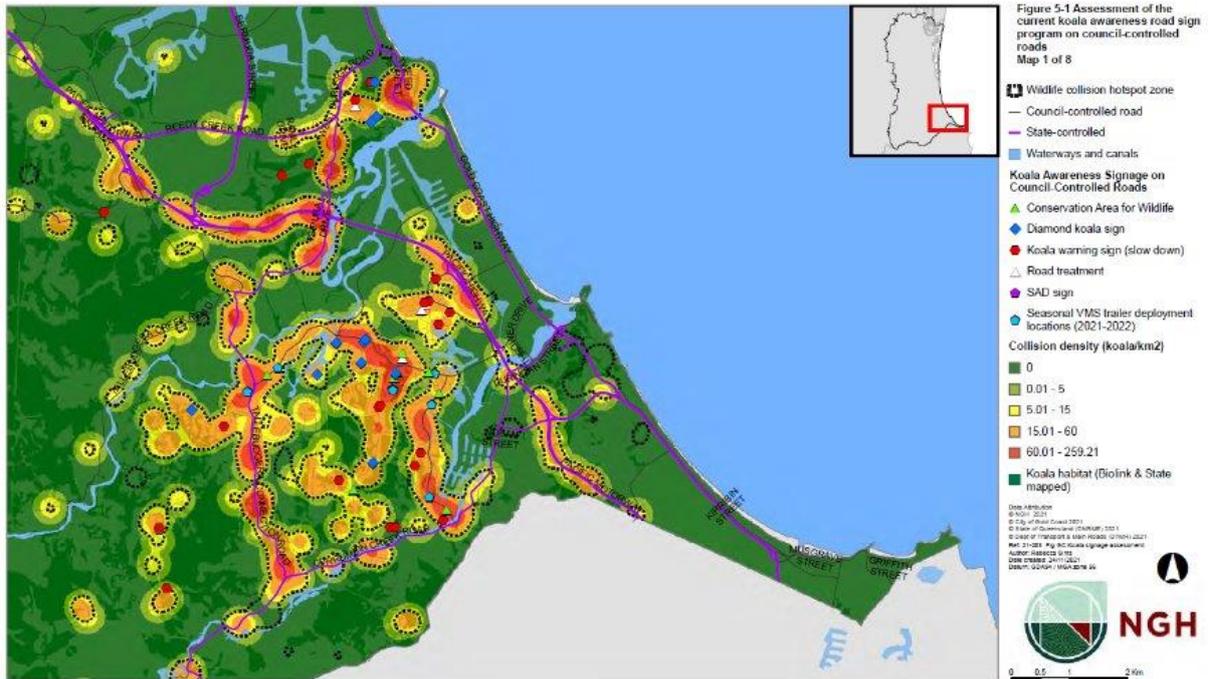
An increase in housing and therefore population close to the KRA 96 site places more residents in proximity of suffering the noise impacts of an operating quarry. Blast noise and vibration cannot not be avoided and nor can the use of drills and machinery to move the blast rock into the crushing sheds. Such noise intrusion is expected to continue for 9 hours a day, 6 days per week for 40 years. Even on Sundays when blasting and work is not undertaken there will be noise from maintenance activities. It is also highly likely that residents will suffer from dust, containing silica, blown by prevailing winds into their homes and nearby schools. Such a health risk is unacceptable.

Increases in traffic:

Old Coach Road is already a very busy road with considerable congestion at peak times prior to school and work starting times. This winding road is used by cars, bikes and school buses. The additional impact of 200- 400 heavy truck movements per day, 6 days per week will increase congestion and danger of accidents as well as fauna 'road kill'. The time frame for the construction of an alternative route of the extension of Bermuda street is unknown so that all truck traffic must travel along Old Coach Road which was never intended as a haulage route and is not an approved b-double route. Questions raised by SARA and Council about the Bermuda St extension are quoted here "*However, this alternate proposal will also result in higher concentration of heavy vehicle movements and traffic in very close proximity to sensitive receptors directly to the east. Consideration will also need to be given to the impacts of this alternate proposal on the residential amenity of the adjoining and surrounding properties.*" This alternative route also appears on diagrammatic maps to cut across Wonga Park and be in direct line of any fauna exiting the fauna underpass of the M1.

Impact on Tourism: The KRA 96 site sits at the entrance to the beautiful Tallebudgera Valley which is an important tourism route to the small parks and the Cream track at the end of the Valley. The impact of large rock filled trucks on tourism traffic of cars, bike riders and some horse riders will be extremely negative and dangerous. Visually this is not in keeping with Council's vision of the green behind the gold being an important attractor under the Nature Based Tourism Strategy.

The map below demonstrates the wildlife collision hot spot zone and it can be observed that the KRA area is identified as one of these. The quarry would result in further exacerbation of such collision with its many daily truck movements.



Potential degradation of Oyster Creek:

The storm water management report discusses the discharge of surface water from the dam and holding tanks into Oyster Creek and Stony Creek and appears to have confidence that the quality of the discharge will meet legislated requirements. However, while climate change is mentioned, the impacts are not discussed in sufficient detail to have confidence that the stormwater system will function adequately. Of most concern is the increasing occurrence of extreme weather events with exceptionally high rainfall “dumps”. The report does not mention whether the dam and holding tanks could cope with such events and prevent the discharge of higher loads of “toxic” silt into the creeks. Oyster Creek has been the subject of extensive rehabilitation following the completion of the M1 road works and it is not acceptable that this work could be threatened by polluting discharge from the quarry.

The Lake/Dam:

Should the quarry be approved the remediation of the site is of utmost importance to restore the site to a functioning ecosystem and effective link in the HCC. It appears from the report that the dam/ lake will remain and that it is expected that the water quality will be satisfactory. However, without constant maintenance, should the dam overflow in the event of an extreme weather event it has the potential to pollute Oyster Creek and perhaps Tallebudgera Creek.

It is also of concern that the lake/dam will become a breeding ground for cane toads, especially if there is no regular inspection undertaken.

The dam/ lake unfenced has the potential to be a danger to people, particularly to children, who it has been demonstrated have been using the site for the last 20 years for various activities.

Conclusion:

On consideration of all the factors in this application, Gecko remains of the informed opinion that the quarry should not be approved by City of Gold Coast Council.

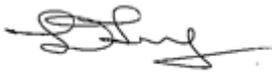
The Planning Scheme requirements set out in the Strategic Framework demonstrate that the issues of loss of integrity of an ecosystem that is crucial to the functioning of the Hinterland Critical Corridor, the threats to endangered koalas and other listed species of fauna and flora from the loss of habitat, the noise of operation and truck movements, security lighting at night and the presence of humans over a period of 40 years, are unacceptable.

In addition, there has been little consideration for the residents of surrounding areas, who will have to suffer the noise, dust and greatly increased traffic dangers from haulage trucks.

Finally, Gecko has not been convinced that there is a need for this quarry to be developed as there are ample supplies of similar materials available on the Gold Coast which can service the southern parts of the city.

This application differs very little from that made in 2013 and was dismissed by the Planning and Environment Court in 2017. For this reason alone, the application must be refused by City of Gold Coast Council.

Yours sincerely



Lois Levy

Campaigner

advocacy@gecko.org.au

0412 724 222