

28th February 2026

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Hon. Ros Bates Minister for Finance, Trade, Employment and Training.
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Hon. Laura Gerber Minister for Youth Justice and Victim Support and Minister for Corrective Services. currumbin@parliament.qld.gov.au

Hon. Hermann Vorster. Assistant Minister for Multicultural Affairs and International Student Attraction. burleigh@parliament.qld.gov.au

Attention Ministerial Call in

Dear Deputy Premier

**Boral Resources
(QLD) Pty Limited**

**Key Resource Area Project. Lot 105 Tallebudgera Creek Road,
Tallebudgera Valley, QLD 4228 and Lot 112 Bermuda Street, Lot 4
Pacific Highway and 1 Ladds Ridge Road, Burleigh Heads QLD 4220**

Gecko Environment Council Association Inc (Gecko) wish to make comment on the proposed Ministerial call-in for the Reedy Creek quarry at the above address. Prior to the notification of a potential call-in Gecko Environment Council Assoc. Inc (Gecko) lodged an objection to the proposed quarry at Reedy Creek KRA 96 with City of Gold Coast Council, and our comments and reasoning relate only to the Reedy Creek application as the West Burleigh proposal is code assessable.

Should the Minister decide to call in this project Gecko requests that his assessment recognises that this application by Boral only differs in minor ways from Boral's 2013 application for a quarry which was rejected by the Planning and Environment Court in 2017 and the Court of Appeal in 2018. Gecko also requests that the Minister recognises the extensive community opposition to this current application (2025) as demonstrated by the 10,000 or more objections lodged with the City of Gold Coast Council in early February 2026. This number of objections is exceptional and must be considered by the Minister in making his decision on the call in.

Introduction

State Interests

Gecko members note that a Ministerial call-in is designed to “*protect economic and environmental state interests*”¹. As outlined in the submission below it is Gecko’s contention that a quarry on the designated site is contrary to the State’s environmental interests particularly in regard to the survival of **the Endangered koala**. The quarry site is within the vital Burleigh Heads to Springbrook corridor which is described in the Gold Coast City Plan as a Hinterland Critical Corridor (HCC). It is Gecko’s opinion that the application does not demonstrate sufficient consideration of surrounding environmental matters as outlined in the detail of the submission to City of Gold Coast Council reproduced in this document.

Gecko seeks confidence from this State Government that both local, regional and state interests will be considered when assessing development and appropriate locations for resource extraction and infrastructure.

As outlined in State Planning Policy, several State Interests would apply to the assessment of this application. We identify several minimum considerations regarding state interests, summarised in table 1.

Table 1: State Interests and related concerns

QLD State Interest statement	Minimum recommended considerations
<p><u>Biodiversity</u> Biodiversity Matters of environmental significance are valued and protected, and the health and resilience of biodiversity is maintained or enhanced to support ecological processes.</p>	<p>It is evident that the development of the quarry at Reedy Creek will result in permanent and irreversible impacts on biodiversity. The community has significant concerns for several biodiversity matters, including impact on:</p> <ul style="list-style-type: none"> - threatened flora and fauna and endangered koalas, uplisted since the initial EPBC assessment. - 9,668 non-juvenile koala habitat trees subject to clearing. - the site’s ecological function as part of the environmentally significant Hinterland Critical Corridor, Burleigh to Springbrook. - local strategic restoration, conservation, and threatened species recovery actions. - permanent loss of habitat in the regional landscape given the impact is deemed unavoidable and offsets cannot reasonably achieve a local net-gain/no net loss. - increasing hazards to wildlife in an existing vehicle strike hot spot area.

¹ <https://www.planning.qld.gov.au/planning-framework/development-assessment/ministerial-call-ins>

<p><u>Water quality</u> The environmental values and quality of Queensland waters are protected and enhanced.</p>	<p>Concerns for both on and off-site impacts to water include:</p> <ul style="list-style-type: none"> - increased pollutants and sedimentation to the recently rehabilitated Oyster Creek due to overflow from holding tanks/dam - potential water table disturbance - safety risk of a contaminated dam to the public and as a breeding site for invasive species (cane toads)
<p><u>Mining and extractive resources</u> Extractive resources are protected and mineral, coal, petroleum and gas resources are appropriately considered to support the productive use of resources, a strong mining and resource industry, economical supply of construction materials, and avoid land use conflicts where possible.</p>	<p>To build community confidence in the planning system, an application of the State Interest Mining and Extractive Resources would effectively "avoid land use conflicts where possible", particularly where extraction is proposed in a residential area.</p>
<p><u>Liveable Communities</u> Liveable, well-designed and serviced communities are delivered to support wellbeing and enhance quality of life.</p>	<p>The quarry poses a threat to the environmental health and wellbeing of residents in nearby streets exposing them to dust (containing silica), noise and the impact of at least 400 heavy haulage trucks per day.</p>
<p><u>Emissions and hazardous activities</u> Community health and safety, and the natural and built environment, are protected from potential adverse impacts of emissions and hazardous activities. The operation of appropriately established industrial development, major infrastructure, and sport and recreation activities is ensured.</p>	<p>As the surrounding area, other than the Hinterland Critical Corridor, continues to be developed for housing, this site and surrounding roads are not appropriate for extractive resource operations given the multiple adverse impacts and increased hazards including:</p> <ul style="list-style-type: none"> - air emissions and increased dust (on flora, fauna as well as residents and local schools) - noise such as machinery and weekly blasting - heavy truck movements <p>Additionally, Scope 1, 2 and 3 emissions apply to this project due to land clearing, truck movements and quarry operations over 40 years.</p>
<p><u>Tourism</u> Tourism planning and development opportunities that are appropriate and sustainable are supported, and the social, cultural and natural values underpinning tourism developments are protected.</p>	<p>The KRA 96 site sits at the entrance to the beautiful Tallebudgera Valley and is a popular route to Currumbin Valley which are important for self-drive tourism and a green gateway to the Cream Track and Cougal Cascades in the foothills of Springbrook National Park. Quarry operations including increasing heavy truck movement are not in keeping with Nature-based Tourism in the region.</p>

Other factors

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 as well as several flora.

Minor Differences in the 2025 application:

The table below refutes Boral's claim that this application is substantially different to that which was refused by the Planning and Environment Court 2017 and Court of Appeal 2018.

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

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. The court decision is still valid.

Table 2: 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 of 4%
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	Severe indirect impact remains on entire site
GC City Plan 2016	Relevant	Relevant	No change

Planning considerations:

Changes to Planning Regulation 2017 state “A development application made for extractive industry development would be assessed by the State Government’s State Assessment Referral Agency (SARA) in accordance with the assessment benchmarks prescribed in the State Development Assessment Provisions (SDAP) – State Code 25: Development in South East Queensland koala habitat areas. These assessment benchmarks are prescribed to ensure extractive industries in key resource areas that involve interfering with koala habitat in an area that is mapped as a koala habitat area will **not result in a net loss of koala habitat, will not fragment koala habitat, will provide for safe koala movement and will not increase the risk of koala death or injury during construction.**”

The quarry will also violate the intent of the **ShapingSEQ 2023** “3.2 Plan development and infrastructure to avoid koala habitat areas, in particular those within koala priority areas, and ensure habitat connectivity for long-term viable populations.”

No need for a quarry at this location:

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.**” There are also 7 other quarries on the Gold Coast to supply need including Nerang and the increase in population to 1 million is not expected until 2046.

Evidence outlined in this submission demonstrates the need to conserve and restore the ecological functions of this site to support the environmental status of the HCC. By the time 2040 arrives these functions will be critical. Further the rock extraction at Reedy Creek is not worth the environmental risks to human and native species health.

Boral has not provided any figures to justify their claims that materials from Reedy Creek quarry would lower costs to customers and there is also no guarantee that Boral would pass on any lower costs.

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 that there will be appropriate remediation and land will be cared for in perpetuity.

Boral now claims in their advertising that “160 hectares of land to be enhanced with tree planting for koalas and gifted to council at quarry’s end of life”, but do not state this is in 40 years’ time. If Boral was genuine in caring for koalas and other native species the site could be “enhanced” now and gifted to Council as a conservation reserve. Boral also state that “53 hectares of land provided to council for open, green space from day 1 should application be approved.” However, they do not advise the location, on the site, of the 53 hectares and how useful it could be to the community while the quarry is active for 40+ years.

Significant negative impact on biodiversity

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 Map14 - 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:

Significant changes have occurred in the area since 2017 including residential development, traffic increases, and conservation actions to enhance and recover urban biodiversity.

Koalas, listed as Vulnerable in 2017, were uplisted to Endangered in 2022 under the Environment Protection 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.

Koalas at serious risk:

The clearing of almost 10,000 non juvenile koala habitat trees is a significant impact of this proposed development. 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 koalas². Cumulative threats to koalas are resulting in increasing mortality rates of many local populations³ (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,

² 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

³ 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.

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.

Impact on the Hinterland Critical Corridor (HCC) Burleigh to Springbrook:

It is evident that the development and operations 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, including endangered koalas, and the functioning of the Burleigh to Springbrook Hinterland Critical Corridor (HCC).

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.* Protection of *Syzygium moorei* is the subject of a variation of the EPBC approval conditions ((EPBC Act Referral 2010/5757) dated 20th August 2025 and demonstrates detailed actions which must be taken to protect this species.

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.

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 and the Precautionary Principle should apply.

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. The lack of data-informed decision making is not acceptable and the Precautionary Principle should apply.

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.

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.

Impacts on liveability and wellbeing for residents:

It is also our member's opinion that the quarry poses a threat to the environmental health and wellbeing of residents in nearby streets exposing them to dust (containing silica), noise and the impact of at least 400 heavy haulage trucks per day on Old Coach Road, a major transport artery for homes and schools in the area.

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.

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 but give no details. It is essential that consideration and reduction of climate change impacts is 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 and connection for our fauna and retention of native flora.

Increases in traffic:

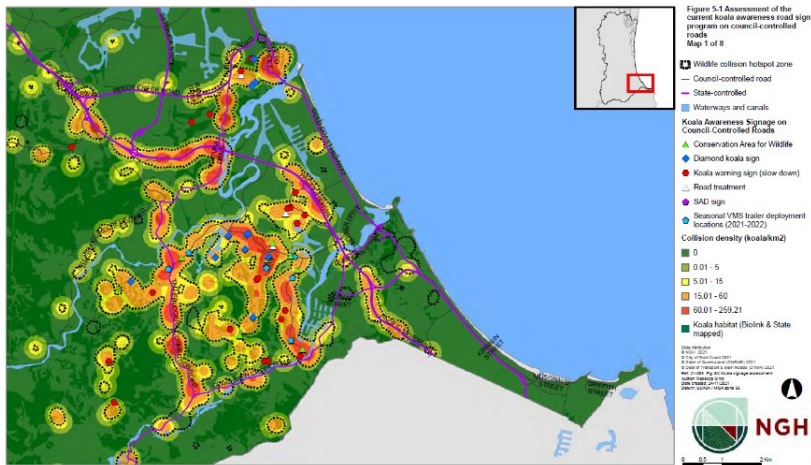
Old Coach Road is already a very busy road with considerable congestion at peak times prior to school and work starting times. This winding road is used by cars, bikes and school buses. The additional impact of 200- 400 heavy truck movements per day, 6 days per week will increase congestion and danger 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 the Minister for Planning or City of Gold Coast Council.

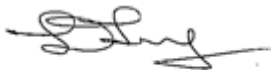
The Planning Scheme requirements set out in the Strategic Framework demonstrate that the issues of loss of integrity of an ecosystem that is crucial to the functioning of the Hinterland Critical Corridor, the threats to endangered koalas and other listed species of fauna and flora from the loss of habitat, 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 any 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 the Minister for Planning or the City of Gold Coast Council.

Yours sincerely



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