

16<sup>th</sup> July 2021

For the attention:

**Liam Jukes**

Senior Planner – Major Assessment  
City Development Branch  
Council of City of Gold Coast

Dear **Liam Jukes**,

Objection submission COM/2019/81 -

Emerging Community and KRA compromised and City Plan breach

Please accept this objection as it highlights that claims of existing land use in the development application are incorrect.

This objection also highlights how Nucrush are very concerned for the health and safety of local residents and the viability of the quarrying activity if there is urban encroachment to within 500 metres of residential homes (as proven via former objections submitted by their managers). Yet, they now propose encroaching their extractive footprint within 150 metres of homes on the northeast (e.g. '8 Rosewall Place'), within approximately 300 metres in the South (e.g. '6 Bakers Ridge Drive') and within 270 meters in the west (e.g. '100 Tamborine-Oxenford Road') or 60 meters if you include their garden as a 'sensitive place' as is I believe required.

Nucrush/Nerang Pastoral are further proposing, via a separate development application, building homes and infrastructure within approx 340 metres of the extractive footprint in the south despite their former concerns for the health and safety of residents if the 500m separation buffer from the quarry is breached.

Lot 7 on Registered Plan 153300, Address: ['6 Yallaroi Road'](#)

It is clear from the Main Development application, Section 1.2, Summary of application detail that Lot 7 is an intrinsic part of the Development application (reproduced in attachment A1). This is despite this being an '*Extractive Industry*' development application and Lot 7 being an '*Emerging Community*' Lot. The location of Lot 7 is highlighted in Attachment A2.

Despite it being an '*Emerging Community*' Lot, the development application claims this will be used to act as a buffer, as specified in '*Section 6.5, Emerging Community Zone*' section of development application, which states: *The following subject sites are identified within the Emerging Community Zone of the Gold Coast City Plan Version 6.*

- **6 Yallaroi Road, Oxenford (Lot 7 on RP153300)**
- **4 Yallaroi Road, Oxenford (Lot 8 on RP153301)**

*No extraction of material is proposed on this land. The portion of land will primarily act as a buffer"* (Attachment A3).

Unfortunately this development application restrains the use of this area for the next one hundred plus years and therefore its current status of '*Emerging Community*' is effectively sterilised for the foreseeable future and is clearly not the intent of these Lots according to the Current city Plan.

However Lot 7, despite being an intrinsic part of this development application on the claimed pretext of being 'Buffer' land for the extractive industry (and therefore requires rezoning as 'Extractive Industry'/'Buffer Land'), it is also part of the proposed housing development (Development Application EXA/2020/14 - which was approved by Delegated Authority) by the applicant too (Attachment B1). In this attachment it can be seen that, despite the claimed use as buffer land in this DA, it is also being utilised in this other development application as part of nine or so homes, also part of a roundabout or turning circle and also part of the access road for the housing developments of '[8 Yallaroi Road](#)' (Lot 6 on Registered Plan 153300, Attachment B2) and '[2 Yallaroi Road](#)' (Lot 9, on Registered Plan 153301, Attachment B3).

Similarly, Lot 8, despite being an intrinsic part of this development application on the claimed pretext of being 'Buffer' land for the extractive industry (and therefore again requires rezoning as 'Extractive Industry'/'Buffer Land'), it is also part of the proposed housing development by the applicant too (Attachment B1). In this attachment it can be seen that, despite the claimed use as buffer land in this DA, it is also being utilised in this other development application as part of eight or so homes and also part of the access road for the housing developments of '[8 Yallaroi Road](#)' (Lot 6 on Registered Plan 153300, Attachment B2) and '[2 Yallaroi Road](#)' (Lot 9, on Registered Plan 153301, Attachment B3).

Therefore, it is clearly not to be the claimed 'Buffer' Land that this development application infers.

It is also noted that this proposed roundabout/turning circle is part of the indicated separation buffer as shown in Attachment B1 and also highlighted in the State Planning Guideline State interest - mining and extractive resources document: '[KRA Reports and Maps document](#)': <https://dsdmipprd.blob.core.windows.net/general/key-resource-area-reports-and-maps-41-to-80.pdf> (reproduced in Attachment B4).

It should go without saying that any development within the separation buffer is not permitted from a health and safety perspective and thus the proposed development of this 'Emerging Community' Lot, '[6 Yallaroi Road](#)' (Lot 7 on Registered Plan 153300) is not permitted whilst the quarry is functioning. Clearly a proposed public roundabout/turning circle within a separation buffer cannot be permitted thus making Development Application EXA/2020/14 and its clear intent in direct opposition to this development application COM/2019/81.

As we are well aware the separation buffer within the '[KRA Reports and Maps document](#)' for KRA68 (as reproduced in Attachment B4) falls well below the 1000 metres DES requirement for health and safety (as discussed in an earlier objection) so proposals such as this to add public areas into this already highly contrived separation buffer is utterly foolhardy.

Clearly the intent for '[6 Yallaroi Road](#)' (Lot 7) and '[4 Yallaroi Road](#)' (Lot 8), Attachment B2) is not '[Extractive Industry](#)' buffer land, as claimed, but is '[Emerging Community](#)' (as per its City Plan zoning). Also, the already approved development application EXA/2020/14 clearly compromises the separation buffer with its public assessable roundabout/turning circle within this area (as shown in Attachment B1) and thus compromises the Key Resource Area requirements. Thus, sterilising this KRA.

Are the Council going to continue this charade of permitting Nucrush/Nerang Pastoral to walk over Council and State planning guidelines in this way? Is '[6 Yallaroi Road](#)' (Lot 7) part of the '[Extractive Industry](#)' or is it part of an '[Emerging Community](#)' residential development? It clearly cannot be both. Surely Nucrush/Nerang Pastoral and the Council cannot have their Cake and Eat it?

### Site Boundary

It is interesting to note the site boundary in the development application (reproduced in Attachment C1). Fails to include Lot 6 and Lot 9, also owned by applicant, however, it uses an area within the claimed 'Site Boundary' as a roundabout/ turning circle for the proposed housing development on these two Lots (as highlighted in Development application EXA/2020/14) and reproduced in Attachment B1.

How can the highlighted site boundary include an area of 'Emerging Community'? This area will be clearly within the separation buffer highlighted in Attachment B4. Therefore, members of the public will use this area whilst going about their everyday business however this will be within the clear requirements of the separation buffer required.

It is clear from the Council's recent approval of Development application EXA/2020/14 that the road servicing these additional properties that are proposed is agreed. Yet it is nonconforming with regards to the state requirement for the separation buffer (Attachment B4).

It would thus seem impossible for the City of Gold Coast Council to approve this development application on the basis that they have recently approved a proposal (Development application EXA/2020/14) that impinges on the states required separation buffer for KRA68.

### Residential Housing Development by Nucrush/Nerang Pastoral

It is sad to note that this development application attempted to include every single Lot owned by Nucrush as an excuse to claim a reasonable separation buffer (in their eyes) was maintained (Attachment C1). However, in this development application, they completely ignored the two Lots that they owned and wished to develop for residential use (Development application EXA/2020/14) despite a proposed ridiculous separation buffer from the extractive footprint of only 340 metres approx (Attachment D1). By combining of Lots 4, 5, 6 and 7 Yallaro Road it would seem they propose creating 22 additional residential lots at close proximity to the quarry extractive footprint. (Attachment B1).

Unfortunately, as discussed earlier, public areas (namely the roundabout/turnaround circle) of this proposed development impinges within the '[KRA Reports and Maps document](#)' required buffer zone for KRA68 (as reproduced in Attachment B4). Therefore, this development application is in stark contrast to the requirements of development application COM/2019/81.

As this is a proposed public area within the required separation buffer, is part of the requirement for development application COM/2019/81 to ensure this area is made safe before Blasting takes place to ensure the safety of people going about the everyday lawful business?

Please note this proposed public area is also required to meet noise and dust environmental limits. Has this been considered?

### Residential Housing Development along Yallaro Road

It is interesting to note that in addition to the 22 residential properties proposed by Nucrush/Nerang Pastoral (DA EXA/2020/14 as shown in attachment B1). There is an additional 47 properties, I believe, proposed (Development Application COM/2021/150 - decision date 23<sup>rd</sup> August 2021?) in the adjacent Lots, Lot 4 and 5 (or 18 and 22 Yallaro Road) as shown in Attachment D1.

Therefore, over and above the requirements of this DA there are separate proposals to build 69 properties in very close proximity (within 330 metres) of the extractive footprint with public areas of these developments within the required separation buffer as highlighted in '[KRA Reports and Maps document](#)' for KRA68 (as reproduced in Attachment B4).

I find the audacity of the applicant to know no bounds. I do hope the Council are aware of this 'Double Bubble' approach to their development plans.

### Nucrush requirement for a 500m buffer from a former Objection re '42 Yallaro Road'

There was also a proposal for housing in 2009 (Council ref: MCU2701089) just South of Lot 6 (identified in attachment E1). Nucrush objected to this (as shown in Attachment E2).

The grounds for the Nucrush objection were: *"The proposed development will result in residential dwellings within 500 metres of a Lot containing an extractive industry operation and identified as an Extractive Industry Resource on Overlay Map OM23 of the Scheme."* (Attachment E3).

And: *"Approval of the Application will compromise the intent of the Scheme (and in particular the intent of the Extractive Industry Domain) by failing to provide any or any adequate protection of the Quarry Land as an identified Extractive Resource and failing to achieve the effective and ongoing separation of extractive industry activity from sensitive uses, such as residential use"* (Attachment E3).

It is important to note this appeal emphasises the need for at least a 500 metre separation buffer. This was also emphasised in the Nucrush objection from the Development Manager, Wade Heggie, who stated: *"We operate the Oxenford Quarry, and wish to advise that Quarry activities are being undertaken within 500 metres of this site"* (Attachment E4).

It can be seen that the distances from the Currently Approved Extractive Footprint is 650 metres (as shown in attachment E5) and, similarly, the distance from the Crushers and Screeners in the Ancillary area is also over 500 metres (also in attachment E5).

Nucrush objected to the proposals. Yet now, they have the audacity to submit a development application where the extractive footprint from these homes is reduced from the existing 650 metres down to an incredulous mere 320 metres. Why do Nucrush now consider this is safe for them to do so at far closer distances than for what this residential development proposed?

It should also be remembered at this time the quarry operations were far further away from the southern boundary. It is only this proposed development application that now seeks to reduce these buffers with no regard for the Current approval protected development areas by way of 'Buffer Land' and 'Permanent Trees and Shrub screening' in this area. Yet here Nucrush/Nerang Pastoral are willing to build homes and infrastructure within an apparently untenable 340 meters of the extractive footprint completely at odds with the objection they submitted.

The objection that was submitted by Nucrush clearly indicates that they required a 500 metre buffer from quarrying activities and were prepared to fight to maintain it. Therefore, their current plan to

reduce buffers to zero in the north (241 Tamborine-Oxenford Road), 150 metres in the East (e.g. '8 Rosewall Place'), within approximately 300 metres in the South (e.g. '6 Bakers Ridge Drive') and within 270 meters in the west (e.g. '100 Tamborine-Oxenford Road') or 60 meters if you include their garden as a 'sensitive place' as is I believe required.

Thus, I believe, proving the proposed development application by Nucrush is utterly preposterous.

#### Nucrush objection against a proposed subdivision by Jefferson Properties

Nucrush objected to another residential housing application, in Wimbledon Way, Oxenford (approximately 300 metres from the extractive footprint), back in January 1997 (Attachment F1), the General Manager, Dugald Gray, stated: *"If the subdivision went ahead (or any subdivision in the quarantined buffer land) we would be forced into breach of the Environmental Protection Act because of the effect of noise, dust and blast vibrations from our quarry"* (Attachment F2). Notwithstanding this, Nucrush, in a similar area (slightly north) is now proposing reducing this separation buffer to an untenable 150 metres.

He went on to say: *"Furthermore blast vibration monitoring has confirmed that the threshold limit for potential structural damage to buildings would be neared. We would also exceed the recommended thresholds for airblast overpressure, probably on all blasts"* (Attachment F2). Note this is not just internal damage to homes this is *"structural damage to buildings"* which is far higher than the 5mm/s threshold within the Environmental Authority EA0002207.

Then he states: *"The Department of Environment have issued some draft guidelines for Extractive Industry and Crushing and Screening plants. They suggest a distance of at least 1000m be maintained between quarrying operations and residential developments"* (Attachment F2).

And: *"We are presently employing best practice techniques to comply with existing legislation on the above. While we are constantly striving to improve our performance it would be impossible for us to comply if houses were build so close to our Quarry"* (Attachment F2).

Also: *"If we were forced into breaching the Environmental Protection Act we would also be in breach of our Quarry Rezoning Agreement with Council as we have obligations under this agreement to conform to the environmental legislation"* (Attachment F2).

Finally, he states: *"Of even greater concern is the safety aspect of houses close to quarries. Our quarrying operations would be almost adjacent to the proposed subdivision. Blasting could occur within 100m or so of houses. As a mining engineer with 15 years' experience, this is a most appalling prospect. It would be grossly negligent to knowingly allow people to live so near a major quarrying operation"* and *"The issue of dust fallout is also extremely relevant. It is an extremely emotive issue. Health issues would certainly be raised were development to proceed"* (Attachment F2).

It would seem clear the Nucrush thoughts on reducing the separation buffer from residential homes to the quarry that are summed up by: *"As a mining engineer with 15 years' experience, this is a most appalling prospect. It would be grossly negligent to knowingly allow people to live so near a major quarrying operation"* and *"The issue of dust fallout is also extremely relevant. It is an extremely emotive issue. Health issues would certainly be raised were development to proceed"*. Therefore, I find it unbelievable that this development application is proposing an extractive footprint within 150 metres of homes and 347 metres of schools. I further find it unbelievable that Nucrush/Nerang Pastoral

are also proposing building homes and infrastructure within approximately 340 metres to the south of the quarry

I also note that the Nucrush General Manager, Dugald Gray, states at the end of the letter: *"We want to ... assist in the creation of a sustainable wildlife habitat for native animals displaced by urban encroachment. Our buffer land and the quarantined buffer land under threat from subdivision could be used to achieve this. The collective area should be large enough to sustain populations of wallaby for example provided a link or corridor can be maintained into the Nerang State Forest. There is a unique opportunity to preserve the quarantined land and create a wildlife haven in tandem with the quarry's buffer land. This could provide a sustainable solution to land use conflict between quarries and residential development."* (Attachment F2). This statement is a bitter pill to swallow, as this development application proposed including the *"Quarantined Land"* (Lot 906) as part of its extractive footprint (having, I think, made a speculative purchase of this area). It is also proposing reducing the critical corridor that is currently around 360 metres wide down to a mere 150 metres (Rosewall Place).

Dugald Gray's claims that: *"Our buffer land and the quarantined buffer land under threat from subdivision could be used to achieve this. The collective area should be large enough to sustain populations of wallaby for example provided a link or corridor can be maintained into the Nerang State Forest. There is a unique opportunity to preserve the quarantined land and create a wildlife haven in tandem with the quarry's buffer land. This could provide a sustainable solution to land use conflict between quarries and residential development."* (Attachment F2). In fact, this development application, COM/2019/81, is the complete opposite of what was claimed by the Nucrush manger.

### **Proposed by residential homes v Proposed now?**

It is interesting to note, these comments from Dugald Gray, the Nucrush Manger are based on homes being further than 200 metres away from the extractive footprint (as shown in attachment F3). The current development application submitted by Nucrush proposes reducing this to 150 metres from homes in Rosewall Place and 170 meters approx to homes in Emerson Way (as shown in Attachment F4).

Therefore Dugald's comments: *"As a mining engineer with 15 years' experience, this is a most appalling prospect. It would be grossly negligent to knowingly allow people to live so near a major quarrying operation"* and *"The issue of dust fallout is also extremely relevant. It is an extremely emotive issue. Health issues would certainly be raised were development to proceed"* are highly relevant. Yet now Nucrush proposing reducing this buffer far further. The prospect is unthinkable.

### **Required 1000m Separation Buffer or BEZ ('Blast Exclusion Zone')**

It should be remembered that the Queensland State guideline for blasting quarries of this nature is a required separation buffer of 1000 metres (or 'Blast Exclusion Zone') for health and safety of workers. I do not believe these guidelines even remotely consider that hundreds, if not thousands of local residents, school children, kindergarten children, workers, tourists, commuters, etc. could be within this area during a blast event as is clearly the case here in Oxenford.

It is thus very interesting to discuss why there is a 1000m separation buffer in Queensland. In the State Planning Policy, 1<sup>st</sup> July 2014, Section 3.8 of Development assessment states: *"The dimensions*



of the separation area for the resource/processing area are based upon the following minimum distances- (a) 1000 metres where the extraction or processing of the extractive resource involves blasting or crushing (namely rock)<sup>2</sup>".

Where: <sup>2</sup> states: "These separation distances are based on the accumulated wisdom of other jurisdictions around Australia and overseas but more specifically the following sources. The 1000 metres separation distance for blasting operations is based on -

- Blastronics Pty Ltd, 1999 Impact of Proposed Coomera Island Development on Nucrush Quarry, Report for Nucrush and Prodap Services, September 1999. Blastronics Systems and Services, Pty Ltd. #C990084 Blasting impact Report".

This is reproduced in Attachment G1.

The 1000 m separation buffer is actually most specifically based on the Nucrush quarry's requirements and a report sanctioned by them in 1999 (and accumulated wisdom of other jurisdictions around Australia and the world)! Thus the 1000m required separation buffer for blasting and crushing quarries was established as a result of a report sanctioned by Nucrush quarry in 1999 and is now the Queensland standard for all quarries in the state. But, here at Nucrush they are seeking to reduce these buffers to 150 metres from homes.

#### The Key Resource Area (KRA)

It is noted that the Nucrush/Nerang Pastoral proposed housing (as shown in attachment B1) is, it would seem, carefully crafted to avoid proposing homes in the northern most end, that is within the KRA separation buffer, as shown in attachment B4. However, they have, placed the roundabout/turning circle of this development, which obviously is a public assessable place and is thus a 'sensitive place', and is thus not permitted whilst this is part of the KRA separation buffer, as shown in attachment B1).

This is confirmed in the following State Planning Policy document: '[State Planning Policy - state interest guidance material - Mining and extractive resources](#)', produced by State of Queensland (July 2017), Department of Infrastructure, Local Government and Planning: [spp-guidance-mining-and-extractive-resources-july-2017.pdf](#)

Within this document is the following Separation area information (in Table 2, reproduced in Attachment H1): "[The separation are surrounding the resources/processing area required to maintain separation from people who may be affected by residual impacts such as noise, dust and ground vibrations of existing or future extractive operations in the resource processing area](#)". It is clear that by Council approving Nucrush/Nerang Pastoral's proposed housing development application EXA/2020/14 (attachment B1) which clearly intends building publically assessable areas within the separation buffer that the KRA has been effectively sterilised by this approval as this area will clearly be "[affected by residual impacts such as noise, dust and ground vibrations of existing or future extractive operations in the resource processing area](#)" (as highlighted by the KRA separation buffer requirements, Attachment B4).

It should be noted what the judge said in the Brisbane Land Court on 3<sup>rd</sup> July 1997 (QLC97-102.pdf) in the case of Nerang Pastoral Co Pty Ltd v Chief Executive Department of Natural Resources: "[I was not](#)

informed of any statutory requirement for an operating quarry to have land set aside to buffer the operations from other land, in particular from residential land, however, there was general agreement between the parties that if sufficient buffer land was not available, encroaching development may bring about an early cessation of quarrying and processing activities where the quarry is located in the path of encroaching residential development. Dust, noise from trucks and machinery and the carrying out of explosions constitute substantial nuisances to residential areas nearby and generate concern and consequent pressure on the local authority to discontinue the quarry use when opportunity presents". It would seem it is clear the Council's approval of development application EXA/2020/14 (by delegated authority) has firmly encroached on the required separation buffer as highlighted in the State Planning Policy: [spp-guidance-mining-and-extractive-resources-july-2017.pdf](#) requirements. (as reproduced in attachment B4).

As we are well aware the *"Indication of a site as a Key Resource Area (KRA) and inclusion in the State Planning Policy (SPP) does not in any way authorise the extraction of the resource nor give anyone the right to establish a quarry. The SPP is designed to maintain access to resources so they can be approved under the development assessment process when they are needed"* (Attachment H2).

It is also noted that in the Gold Coast City Plan, Specific Benchmarks for assessment for Extractive Resources Overlay Code, 8.2.7.3, Part B Assessable Development Benchmarks, Separation Area and 100m Transport route separation Area, Performance Outcome PO2 states: *"Development where located within the Separation Area and 100m Transport Route Separation Area:*

- (a) Does not compromise the current and/or future extraction, processing and transportation of resources;*
- (c) Ensures an appropriately sized buffer between sensitive land uses, the resources/processing area and the transport route to the KRA"* (Attachment H3).

Clearly development application EXA/2020/14 approval compromises: *"the current and/or future extraction, processing and transportation of resources"* by having a publically assessable area within the separation buffer (attachment B4).

Similarly, development application EXA/2020/14 approval ensures there is not: *"an appropriately sized buffer between sensitive land uses, the resources/processing area"*, again, by having a publically assessable area within the separation buffer (attachment B4).

Over and above all the other properties and public areas that are already compromising the KRA's separation buffer (as can be seen in attachment B4, and covered in an earlier objection titled: *"Key Resource Area 68 has been compromised"*, dated 7<sup>th</sup> June 2021), I believe, it is perfectly clear to see this KRA has been sterilised by Council's recent approval of development application EXA/2020/14 which is, it would seem, permitting publically accessible areas within the separation buffer (attachment B4).

#### Koala Habitat

I also note that Lots 6,7, 8 and Lot 9, all owned by Nucrush/Nerang Pastoral and all included in the proposed housing development application (EXA/2020/14), as shown in attachment B1, are virtually wholly classified on the Gold Coast City Plan as *'Environmental significance - priority species'* (Koala Habitat) area (as shown in attachment J1).



This is part of the Critical Corridor to the Nerang State Forest as highlighted in the City of Gold Coast Councils, January 2016, report: *'Critical Corridor and Substantial Remnant mapping'* (reproduced in attachment J2, close up in attachment J3).

This makes a complete mockery of the Nucrush claims to be environmentally friendly. It is plain to me that Nucrush/Nerang Pastoral will do anything in their power to develop as much of the area as they can with absolutely no recourse for the local environment.

#### City of Gold Coast Critical Corridor and Substantial Remnant mapping

In the City of Gold Coast Councils, January 2016, report: *'Critical Corridor and Substantial Remnant mapping'* in *'Section 3.6.3.1 Buffer areas'* it states: *"The 500 m width is consistent with the approach taken in previous corridor projects (i.e. Chenoweth 2009; 2010). It also aligns with the findings of the literature review; discussed in Section 2.2.1, which recommends that regional corridors be greater than 500 m wide"* (reproduced in attachment J4).

The proposals in development application COM/2019/81 clearly significantly jeopardises these requirements by reducing the *'Critical Corridor'* (already significantly impacted by existing quarry and urban encroachment) down to a completely ridiculous 150 metres width that I do not believe is viable for a Critical Corridor, and as endorsed in the Council's report: *'Critical Corridor and Substantial Remnant mapping'* (reproduced in attachment J4).

Similarly, Nucrush/Nerang Pastoral's housing proposed development (as shown in attachment B1) will also have a significant impact on the Critical Corridor approaching Lot 906, the Open Space Lot, above it.

Despite being a significant land owner of environmentally significant areas (as highlighted by the Gold Coast City Plan) Nucrush's plans clearly are significantly different to the Gold Coast Councils Critical Corridor requirements. I hope the Gold Coast Council will maintain their requirement for the Critical Corridor and the environmentally significant areas in and around the quarry.

#### Conclusion

It would seem that the Gold Coast Council are endorsing the proposed housing development by Nucrush/Nerang Pastoral that clearly compromises the KRA separation buffer of KRA 68.

Do they really understand the implications and the absurdity of this so close to the quarry's proposed extractive footprint? It would seem Nucrush themselves are aware of how dangerous this situation is having objected to two separate proposed housing developments, that were further away than their own proposals, on the ground of health and safety for the new residents.

It would therefore seem that Nucrush/Nerang Pastoral and the City of Gold Coast Council both wish to have their proverbial Cake and eat it.

Are these areas critical separation buffers from the quarry extractive footprint as claimed by Nucrush? Or prime real-estate land for building? You simply can't have it both ways! Either way it is entirely unrealistic to include it as 'Buffer Land' and also, use it as part of the Emerging Community but within the designated separation buffer (as per proposals in Nucrush/Nerang Pastoral development application EXA/2020/14).

I implore the City of Gold Coast Planners to realise that they cannot permit this continued encroachment into the separation buffer that has effectively sterilised the quarry operation and permit what amounts to a super quarry to operate too. In fact, the quarry's proposed reduction of separation buffer, zero metres in the north (241 Tamborine-Oxenford Road), 150 metres in the East (e.g. '8 Rosewall Place'), within approximately 300 metres in the South (e.g. '6 Bakers Ridge Drive') and within 270 meters in the west (e.g. '100 Tamborine-Oxenford Road') or 60 meters if you include their garden as a 'sensitive place' as is I believe required or 300 metres from their very own proposed housing development, is clearly not suitable for a blasting quarry of this nature. This is further endorsed by the hundreds of homes within the 1000 metre Blast Exclusion Zone that is required for a blasting quarry which underlines the complete hypocrisy for permitting the extension and expansion of this polluting behemoth.

Will the City of Gold Coast take the moral high ground as they did in the Boral Reedy Creek Quarry case and refuse this development application or will they be driven by financial incentives (in whatever form they may take) over the health, safety and personal welfare of thousands of local people?

Please note any approval of this development application (COM/2019/81) will have to be challenged in Court on a number of clearly non-conforming aspects that have since come to light since public notification closed. Are the City of Gold Coast Council willing to defend such clear non-conformance in a Court of Law against the residents of the Gold Coast?

I beg the City of Gold Coast Council not to approve this development application and to thus not force the local residents to take the City of Gold Coast to Court in a case with such marked parallels to the Boral Reedy Creek quarry case in 2015, and subsequent rejected appeal in 2017, where the quarry lost, as indeed I believe would happen in this case too.

Thank you in anticipation,

Kind regards

Tony Potter

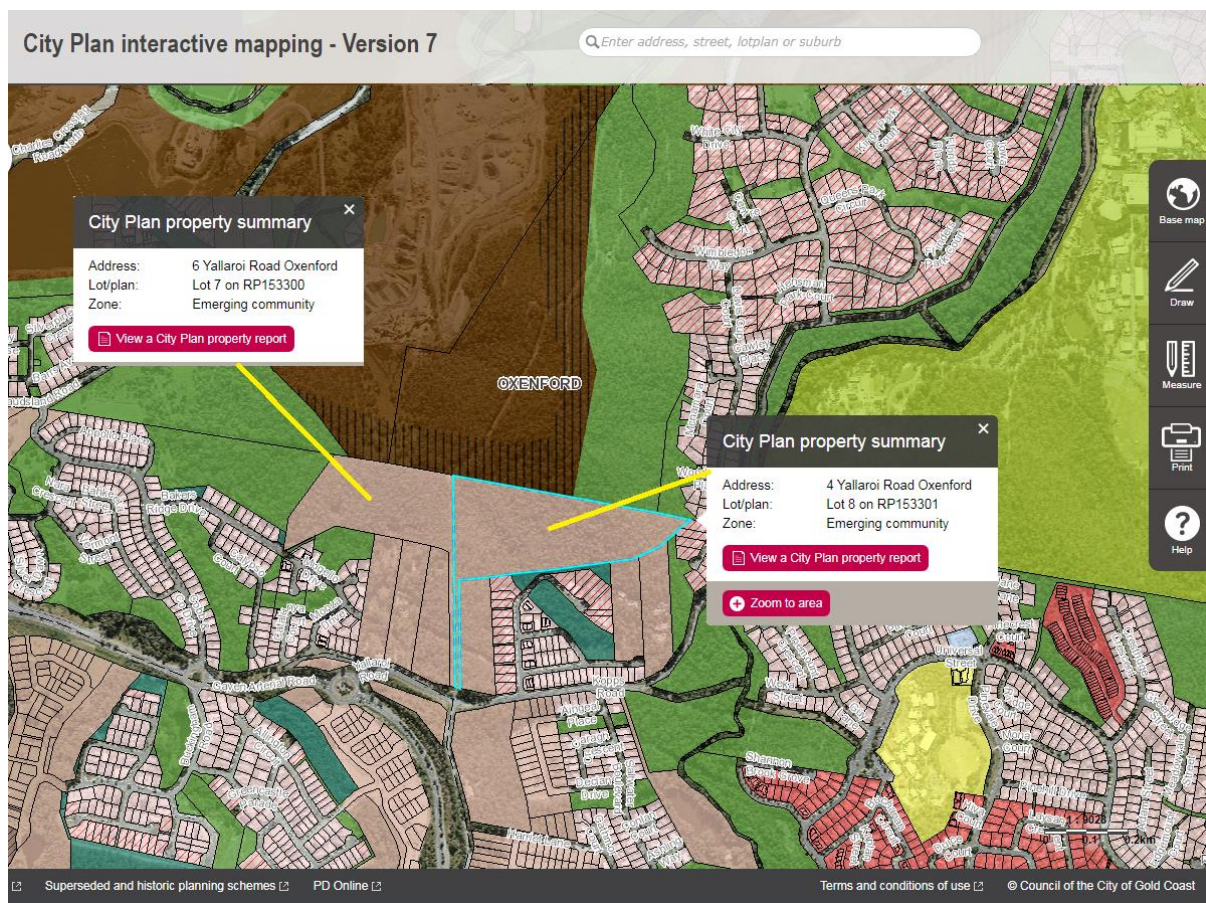
\* Disclaimer. Please note my findings are believed correct and are to the best of my ability. However, there may be errors and assumptions I have made that are incorrect. I do not believe this to be the case, but, realise with the vast amount of submitted data from the applicant, errors and assumptions on my part may occur. Hopefully this is not the case, but please accept my apologies if this is so. Thank you.

## 1.2 Summary of Application Details

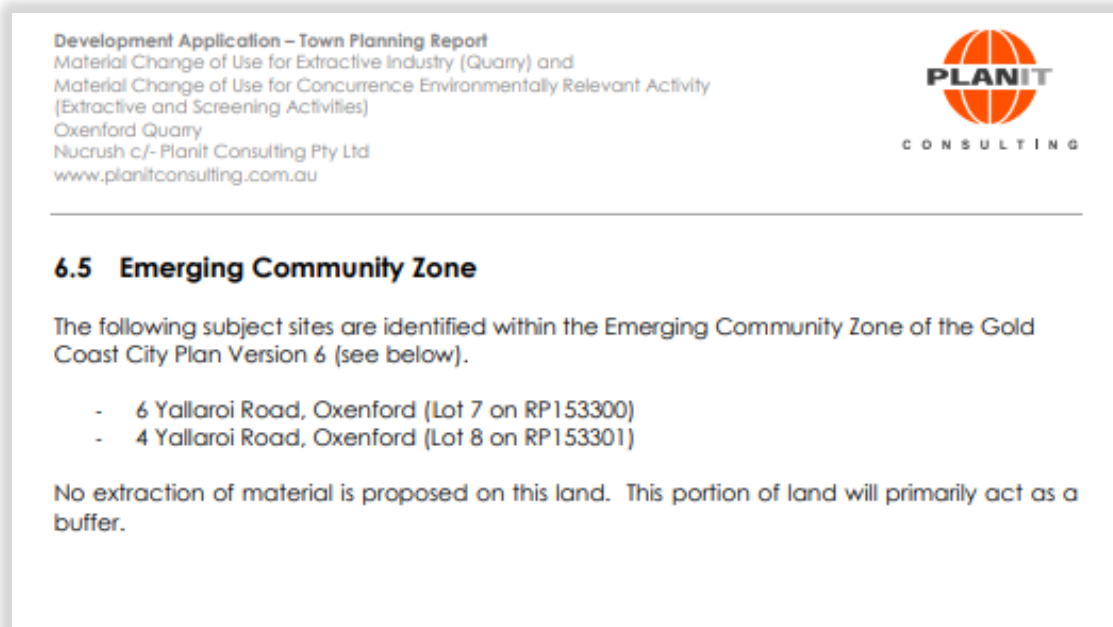
Table 2- Basic Information

| Basic Information                         |   |                     |
|---|---|---------------------|
| <b>Applicant</b>                          | Nucrush Pty Ltd C/- Planit Consulting Pty Ltd<br>PO Box 206<br>Nobby Beach Qld 4218<br>Attention: Bede Emmett<br>email: <a href="mailto:bede@planitconsulting.com.au">bede@planitconsulting.com.au</a>  |                     |
| <b>Owners</b>                             | Nerang Pastoral Pty Ltd   |                     |
| <b>Application</b>                        | <ul style="list-style-type: none"> <li>- Development Permit for the Material Change of Use for an extension to the existing approved quarry footprint and the duration of an existing lawful Extractive Industry (Quarry) – Impact Assessment</li> <li>- Development Permit for Environmentally Relevant Activity (ERA) (Extractive and Screening Activities)</li> <li>- Development Permit for Operational Works – Clearing Native Vegetation</li> </ul> |                     |
| <b>Address &amp; Property Description</b> | Lot 906 Wimbledon Way, Oxenford   | Lot 906 on SP108985 |
|   | 33 Maudsland Road, Oxenford   | Lot 467 on RP845775 |
|   | 99 Maudsland Road, Oxenford   | Lot 468 on RP845775 |
|   | 6 Yallaroi Road, Oxenford   | Lot 7 on RP153300   |
|   | 4 Yallaroi Road, Oxenford   | Lot 8 on RP153301   |
|   | Lot 901 Emerson Way, Oxenford   | Lot 901 on RP883083 |
|   | 1 Roche Court, Oxenford   | Lot 464 on RP228385 |
|   | Lot 905 Wimbledon Way, Oxenford   | Lot 905 on SP108985 |
| <b>Total Site Area</b>                    | Combined Site Area is 151.4 hectares  |                     |
| <b>Zone</b>                               | Extractive Industry, Extractive Industry Indicative Buffer and Open Space Zone, Emerging Community  |                     |
| <b>State Mapping</b>                      | Urban footprint, Regulation Vegetation, State Transport Corridor, Key Resource Area (resource/processing area, separation area, transport route, transport route separation area)   |                     |

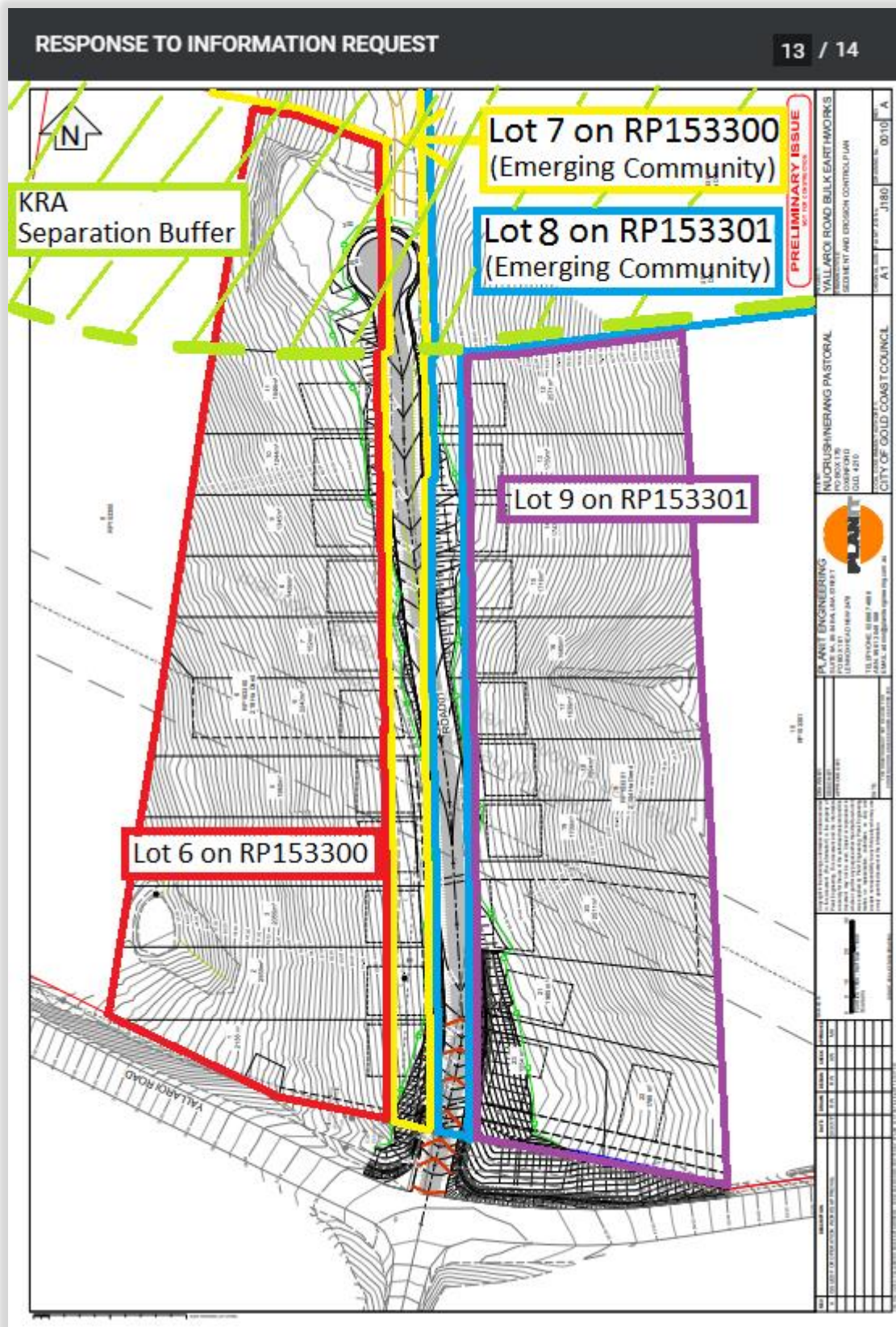
## Attachment A2 - Map of Quarry footprint impinging on Lot 7 and Lot 8



## Attachment A3 - Extract from the Main Application showing 'Emerging Community' re-purposed as Buffer







Attachment B2 - '8 Yallaroi Road' (Lot 6 on Registered Plan 153300, Attachment B2)

Queensland Titles Registry Pty Ltd  
ABN 23 648 568 101

Title Reference: 15615177

Search Date: 12/07/2021 12:11

Date Title Created: 22/02/1977

Request No: 37832503

Previous Title: 15236121

#### ESTATE AND LAND

Estate in Fee Simple

LOT 6 REGISTERED PLAN 153300  
Local Government: GOLD COAST

#### REGISTERED OWNER

Dealing No: 717017535 19/01/2016  
NERANG PASTORAL CO. PTY LTD A.C.N. 010 119 990

#### EASEMENTS, ENCUMBRANCES AND INTERESTS

1. Rights and interests reserved to the Crown by  
Deed of Grant No. 10469024 (POR 56)
2. EASEMENT IN GROSS No 602128842 (F906690) 26/09/1979  
BURDENING THE LAND  
TO THE SOUTH EAST QUEENSLAND ELECTRICITY BOARD  
OVER EASEMENT F ON RP153300
3. TRANSFER No 703629595 13/10/1999 at 14:47  
EASEMENT IN GROSS: 602128842 (F906690 )  
SOUTH EAST QUEENSLAND ELECTRICITY CORPORATION LIMITED A.C.N.  
078 849 055

#### ADMINISTRATIVE ADVICES

NIL


#### UNREGISTERED DEALINGS

NIL

Caution - Charges do not necessarily appear in order of priority

\*\* End of Current Title Search \*\*





Open with ▾

Current Title Search

Queensland Titles Registry Pty Ltd  
ABN 23 648 568 101

|                     |            |              |                  |
|---------------------|------------|--------------|------------------|
| Title Reference:    | 15683142   | Search Date: | 12/07/2021 12:15 |
| Date Title Created: | 01/09/1977 | Request No:  | 37832596         |
| Previous Title:     | 15236121   |              |                  |

**ESTATE AND LAND**  
Estate in Fee Simple  
LOT 9      REGISTERED PLAN 153301  
Local Government: GOLD COAST

**REGISTERED OWNER**  
Dealing No: 717017535    19/01/2016  
NERANG PASTORAL CO. PTY LTD A.C.N. 010 119 990

**EASEMENTS, ENCUMBRANCES AND INTERESTS**

1. Rights and interests reserved to the Crown by  
Deed of Grant No. 10469024 (POR 56)
2. EASEMENT IN GROSS No 602153858 (F906691) 26/09/1979  
BURDENING THE LAND  
TO THE SOUTH EAST QUEENSLAND ELECTRICITY BOARD  
OVER EASEMENT J ON RP153301
3. TRANSFER No 703629618 13/10/1999 at 14:52  
EASEMENT IN GROSS: 602153858 (F906691 )  
SOUTH EAST QUEENSLAND ELECTRICITY CORPORATION LIMITED A.C.N.  
078 849 055
4. EASEMENT IN GROSS No 701988715 22/05/1997 at 09:28  
burdening the land  
COUNCIL OF THE CITY OF GOLD COAST  
over  
EASEMENT C ON RP902389

**ADMINISTRATIVE ADVICES**  
NIL

**UNREGISTERED DEALINGS**  
NIL

Caution - Charges do not necessarily appear in order of priority

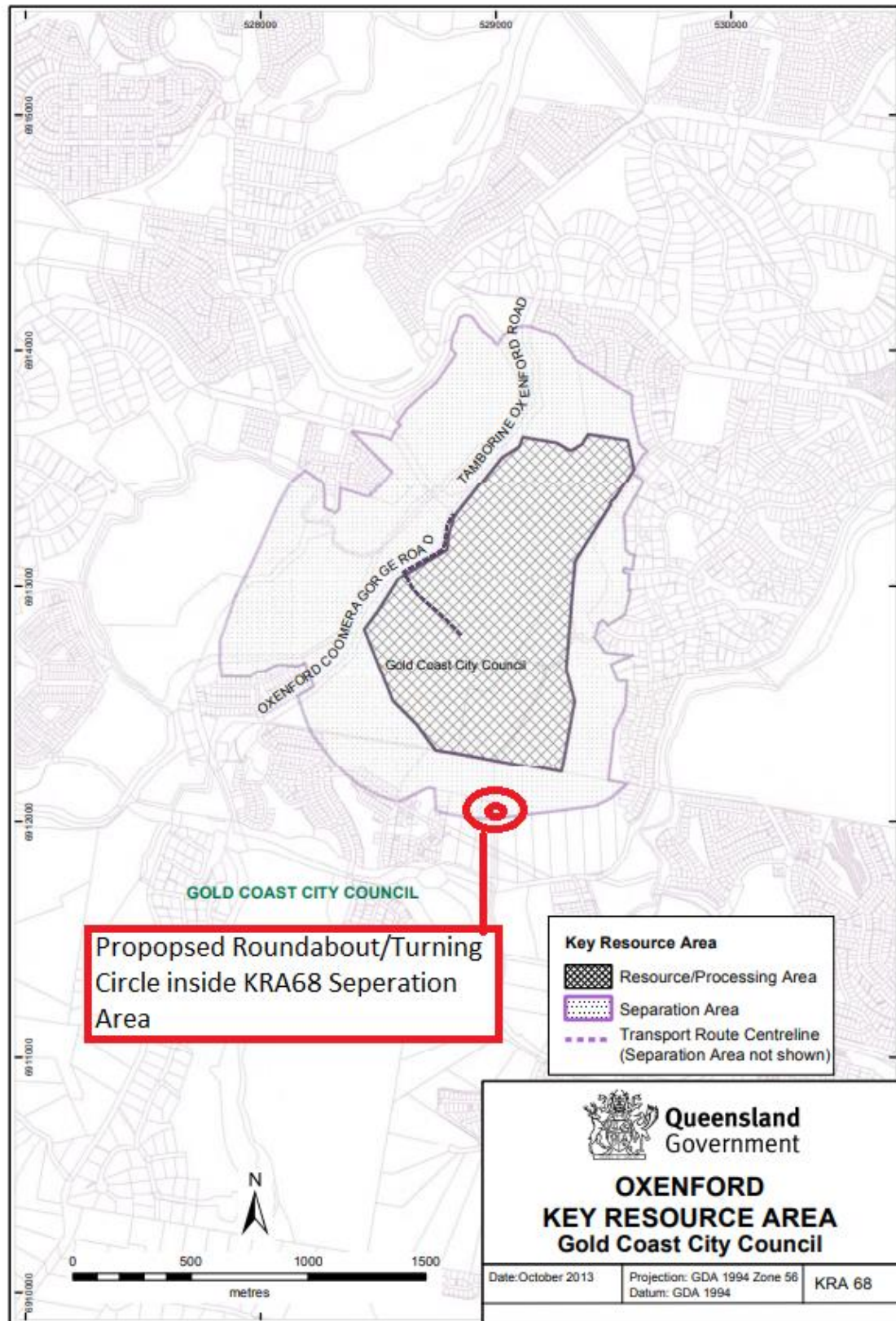
\*\* End of Current Title Search \*\*

Page 1 / 1

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Requested by: D-ENQ PROPERTY & TITLE SEARCH

www.titlesqld.com.au  
Page 1/1



Development Application – Town Planning Report  
Material Change of Use for Extractive Industry (Quarry) and  
Material Change of Use for Concurrence Environmentally Relevant Activity  
(Extractive and Screening Activities)  
Oxenford Quarry  
Nucrush c/- Planit Consulting Pty Ltd  
www.planitconsulting.com.au

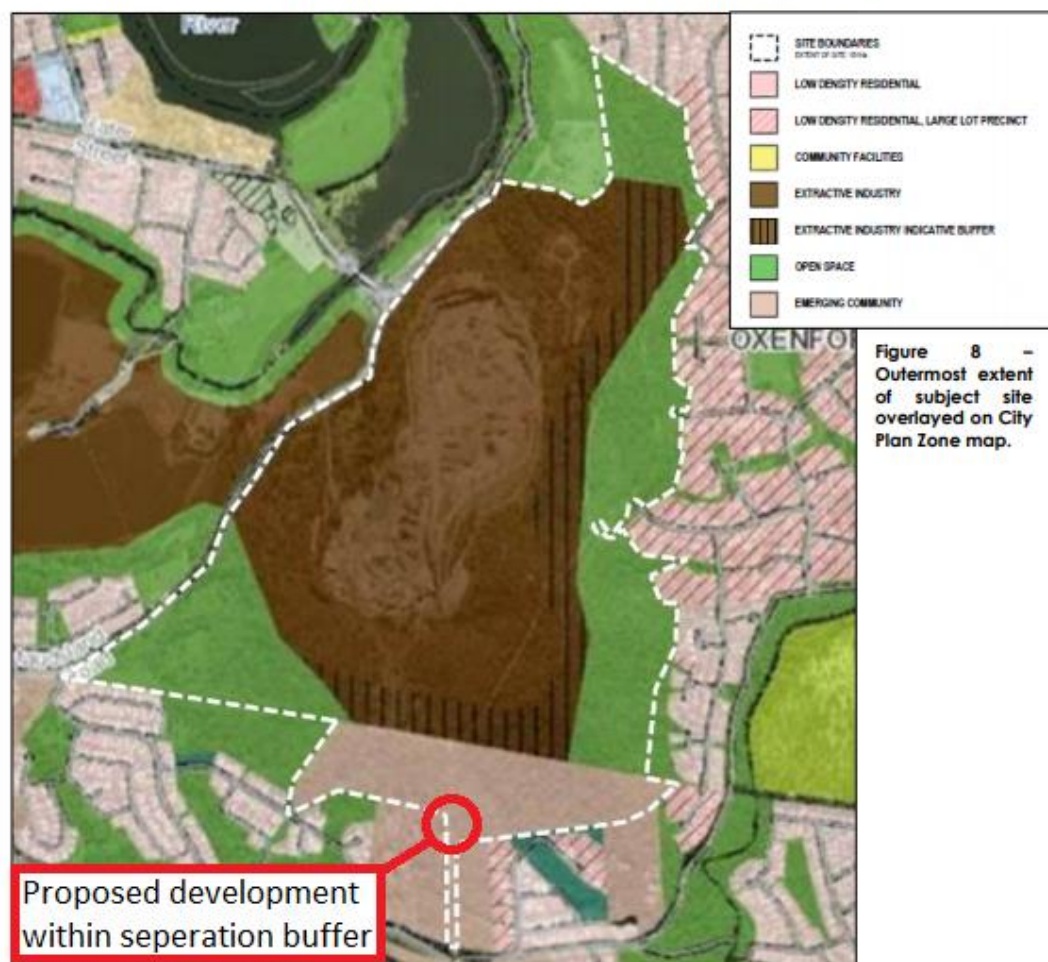


### 6.3 Extractive Industry Zone

The majority of the site is included within the Extractive Industry Zone of the Gold Coast City Plan Version 6 (see below).

A review against the purpose of the Extractive Industry Zone Code is provided below.

The Extractive Industry Indicative Buffer will not be transgressed by the proposed changes to the quarry footprint. The part of the site that will be retained for buffer and biodiversity corridors equates to approximately 84.78 hectares (approximately 56% of the entire site).





Attachment D1 - Section 6.3, Extractive Industry Zone, with Nucrush/Nerang Pastoral proposed housing development highlighted





2009-05-18 Yallaroi Road appeal by Nucrush.pdf

1 / 6

Telephone +61 (0)7 5574 1000  
Facsimile +61 (0)7 5574 1130  
www.hickeylawyers.com.au



H I C K E Y  
L A W Y E R S

Corporate Centre  
Cnr Bundall Rd & Slatyer Ave  
Bundall Queensland Australia  
Box 5559 GCMC  
Queensland 9726 Australia

Our Ref: KLJ:lr:297427/5

18 May 2009

Chief Executive Officer  
Department of Infrastructure & Planning  
Planning Information Area  
PO Box 15009  
BRISBANE QLD 4002

Attention: Chief Executive Officer

Dear Sirs,

**RE: 42 YALLAROI ROAD, OXENFORD – GOLD COAST CITY COUNCIL**  
**REFERENCE: MCU2701089**

Tony Hickey  
LL.B(Hons) | OWNER

Mark Lacy  
B.Com, LL.B | OWNER

Jamie Bolic  
B.Ec(Hons), LL.B(Hons) | OWNER

Joe Welch  
LL.B | OWNER

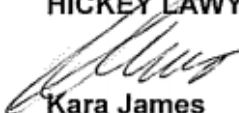
Simon Chan  
LL.B | OWNER

We act for the Appellant, Nucrush Pty Ltd, in the above named matter.

Please find **enclosed**, by way of service, our client's Notice of Appeal filed 15 May 2009.

You may, within 10 business days after the Notice is given, elect to become a Co-Respondent to the Appeal by filing in the Court a Notice of Election in the approved form.

Yours faithfully  
**HICKEY LAWYERS**

  
**Kara James**  
**Associate**

**Litigation Division**

Direct Email: jamesk@hickeylawyers.com.au

Direct Line: 07 5556 7453

Direct Fax: 07 5574 1330

1201885\_1.DOC



11. The grounds relied upon by the Appellant in bringing this Appeal are as

- (a) The proposed development will result in residential dwellings within 500 metres of a Lot containing an extractive industry operation and identified as an Extractive Industry Resource on Overlay Map OM23 of the Scheme;
- (b) the Respondent's assessment of the Application failed to give any or any sufficient consideration to the proximity of the Co-Respondent's proposed development to the Appellant's extractive industry operation, and whether the Co-Respondent's development will result in negative impacts on the Appellant's quarrying operation;
- (c) The Co-Respondent has not provided any evidence that the proposed development will be compatible with the Appellant's quarrying operation. The Co-Respondent has not addressed (by undertaking appropriate studies) relevant considerations, including but not limited to, operational noise, dust, ground vibrations and air blast pressure;
- (d) The failure to address the relevant considerations referred to in paragraph 6(c) above has the effect that the Respondent has not properly assessed the appropriateness of the proposed development and the adverse impacts of the proposed development on the identified Extractive Resource and the Appellant's quarrying operation;
- (e) Approval of the Application will compromise the intent of the Scheme (and in particular the intent of the Extractive Industry Domain) by failing to provide any or any adequate protection of the Quarry Land as an identified Extractive Resource and failing to achieve the effective and ongoing separation of extractive industry activity from any sensitive uses, such as a residential use.

OBJECTION TO DEVELOPMENT APPLICATION

1 / 1



NUCRUSH PTY LTD A.B.N 23 010 119 981  
P.O. Box 179 Oxenford QLD 4210  
Reg Office Hart Street Upper Coomera QLD  
T (07) 5573 8000 FX (07) 55732 908  
www.nucrush.com.au

Our Ref: 9030-24-WH140408

14<sup>th</sup> April 2008

Attention: Shailendra Singh  
The Chief Executive Officer  
Gold Coast City Council  
PO Box 5042  
Gold Coast MC  
Queensland 9729



Dear Sir,

**Re:** Objection to Reconfiguration of Lot (Impact Assessment for Subdivision to Create 20 Freehold Lots at 42 Yallaroi Road, Oxenford, Lot 1 on RP 159054)

**Your Ref:** MCU2701089

I write in reference to the above Development Application, which is currently open for Public Submission. We operate the Oxenford Quarry, and wish to advise that Quarry activities are being undertaken within 500 metres of this site.

The Queensland Government has identified the Oxenford Quarry as a Key Resource within the State Planning Policy (SPP), and the boundary of the Key Resource Area abuts this property. The boundary defining the Key Resource Area is an arbitrary line drawn on a Cadastral map, and does not take into account other factors such as topography. It would appear as though the applicant in this instance has not had any monitoring or analysis carried out on the site, to ascertain whether the said property would be affected by the Quarry activities.

As the State Government has sought to protect the Key Resource Area through legislation, to ensure that it will not suffer any reverse amenity from urban encroachment; we would have expected that as part of the Town Planning Assessment Report this proximity to the Quarry would have been mentioned. We would also anticipate that monitoring and analysis be undertaken to assess any expected impact on the site due to Quarry activities, prior to Development Approval being granted.

Should you wish to contact me to discuss this matter, or to meet with Council Officers, please do not hesitate to contact me on the above number.

Yours sincerely,

Wade Heggie  
Development Manager

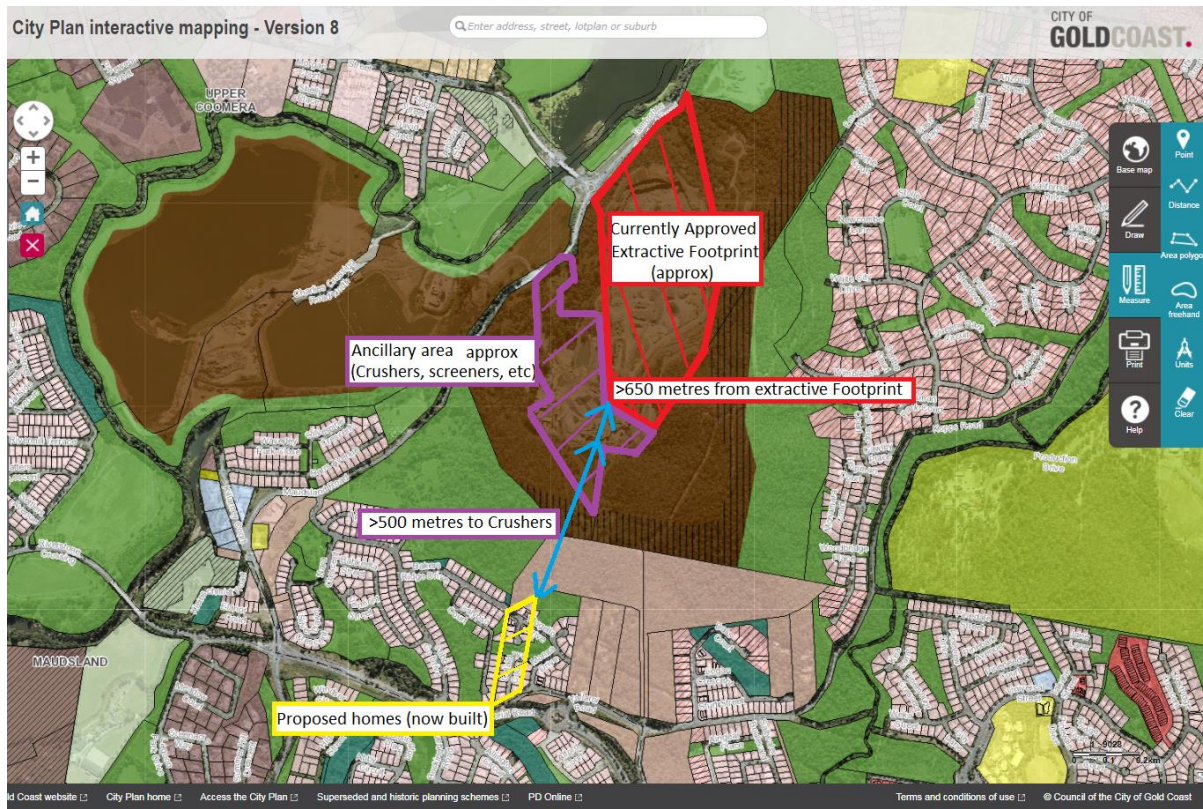


**NUCRUSH GROUP** incorporates

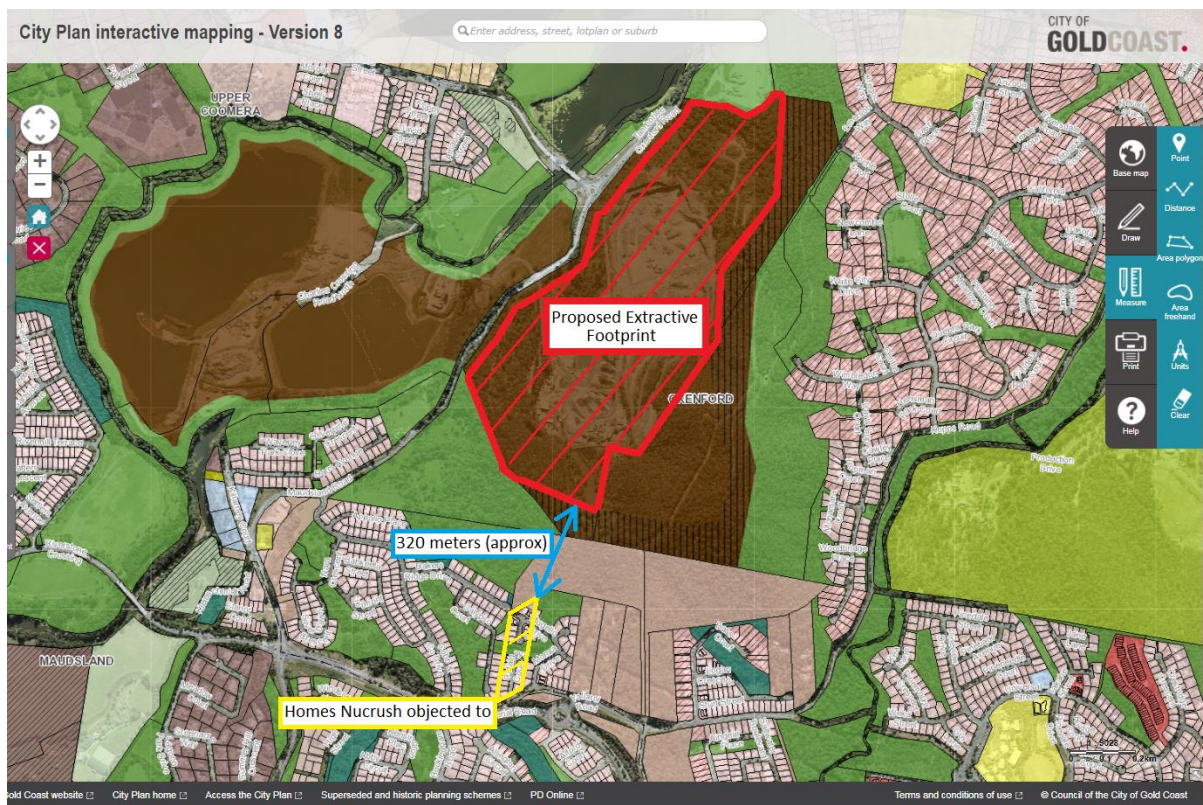
**NERANG PASTORAL** **NUCON CONCRETE** **NUCRUSH PROPERTY** **NUCRUSH QUARRIES**



Attachment E5 - Proposed distances between residential homes and Extractive footprint when Nucrush objected to MCU2701089 (2009)



Attachment E6 - Proposed distances between these residential homes & Extractive footprint in current DA





1997-01-13 Nucrush general manager letter Dugald Grey re urban encroachment.p.. 1 / 5

**NUCRUSH PTY. LTD.**  
A.C.N. 010 119 981  
Registered Office Hart Street, Upper Coomera. Ph: (07) 5573 1388 Fax: (07) 5573 2908  
PO Box 179, Oxenford, Qld. 4210

13th January, 1997

Chief Executive Officer  
Gold Coast City Council  
PO Box 5042  
**GOLD COAST MC QLD 9729**  
**ATTENTION: MR DEAN BURNAM**

Dear Sir,

**RE URBAN ENCROACHMENT - BUFFER LAND OXFENFORD QUARRY**

We submit the following information regarding our quarrying activities in response to a proposed subdivision by Jefferson Properties at Wimbledon Way, Forest Hills, Oxenford.

1. In situ reserves contained within the Extractive Industry zoning indicate a quarry life of approximately 60 years based on current and projected production rates.
2. Key Dates: are as follows:

|         |   |
|---------|---|
| 12.9.89 | Development Agreement between Midland Credit Ltd and Albert Shire Council.                          |
| 12.9.89 | Deed of Novation between Midland Credit Ltd., Albert Shire Council and Nerang Pastoral Co. Pty.Ltd. |
| 25.9.89 | Nerang Pastoral Co. Pty.Ltd. purchase of Lot 463 on RP228373 from Midland Credit Ltd. (settlement)  |

GCCC RECEIVED  
22 JAN 1997  
ATT No. ( )  
REFER TO  
FILE No. ( )  
FORWARD COPY SENT  
FILE REQUEST

4.

If the subdivision went ahead (or any subdivision in the quarantined buffer land) we would be forced into a breach of the Environmental Protection Act because of the effect of noise, dust and blast vibrations from our quarry. We have conducted monitoring of the quarantined land which shows we would significantly exceed the proposed environmental protection policy limits for noise. A copy of the study is enclosed. (Appendix 1)

Furthermore blast vibration monitoring has confirmed that the threshold limit for potential structural damage to buildings would be being neared. We would also exceed the recommended thresholds for airblast overpressure, probably on all blasts.

The Department of Environment have issued some draft guidelines for Extractive Industry and Crushing and Screening plants. They suggest a distance of at least 1000m be maintained between quarrying operations and residential developments. (copy attached Appendix 2)

We are presently employing best practice techniques to comply with existing legislation on the above. While we are constantly striving to improve our performance it would be impossible for us to comply if houses were built so close to our Quarry.

If we were forced into breaching the Environmental Protection Act we would also be in breach of our Quarry Rezoning Agreement with Council as we have obligations under this agreement to conform to the environmental legislation. Again we would have to consider our legal position with all parties concerned.

5.

Of even greater concern is the safety aspect of houses close to quarries.

Our quarrying operations would be almost adjacent to the proposed subdivision. Blasting could occur within 100m or so of houses. As a mining engineer with 15 years experience, this is a most appalling prospect. It would be grossly negligent to knowingly allow people to live so near a major quarrying operation.

The issue of dust fallout is also extremely relevant. It is an extremely emotive issue. Health issues would certainly be raised were development to proceed.

We want to use the information to assist in the creation of a sustainable wildlife habitat for native animals displaced by urban encroachment. Our buffer land and the quarantined buffer land under threat from subdivision could be used to achieve this. The collective area should be large enough to sustain populations of wallaby for example provided a link or corridor can be maintained into the Nerang State Forest. There is a unique opportunity to preserve the quarantined land and create a wildlife haven in tandem with the quarry's buffer land. This could provide a sustainable solution to land use conflict between quarries and residential development. Most certainly this is a solution which is receiving considerable attention overseas.

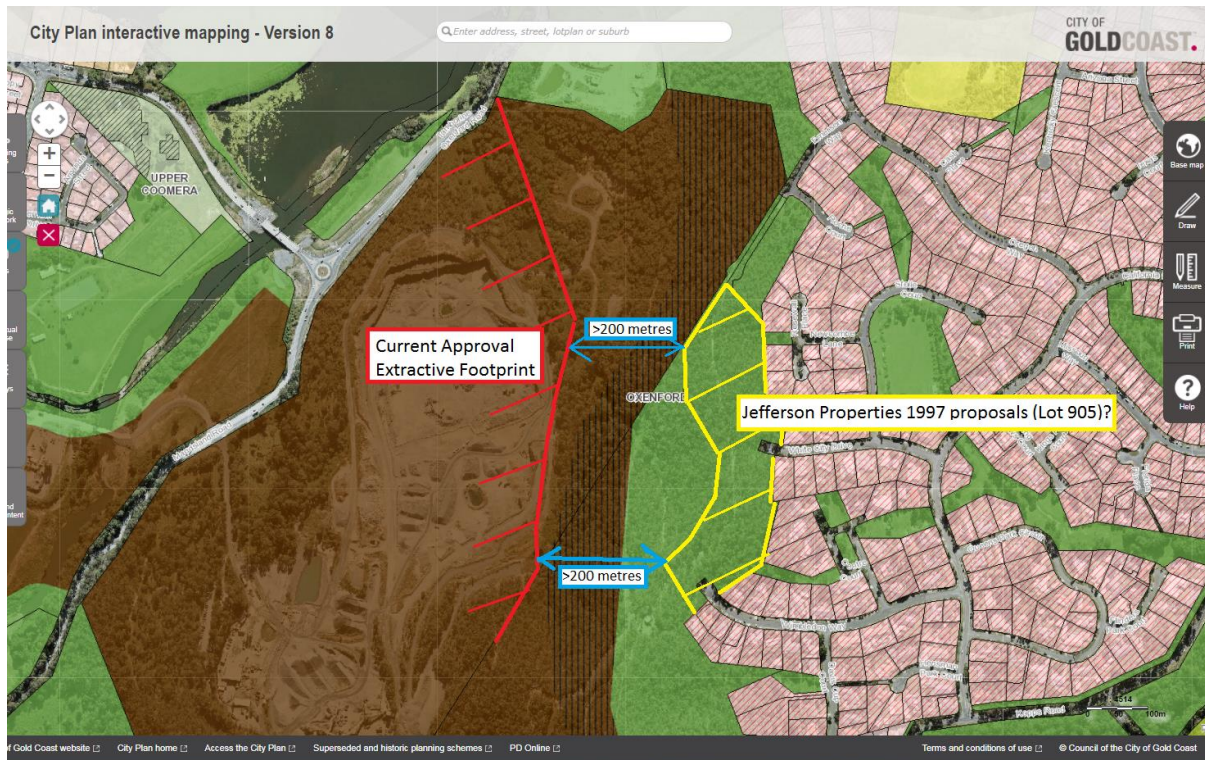
Yours faithfully  
NUCRUSH PTY.LTD.



Dugald Gray  
GENERAL MANAGER



### Attachment F3 - Proposed distances between residential homes and Extractive footprint when Nucrush objected (1997)



### Attachment F4 - Proposed distances between residential homes & Extractive footprint in current DA





# State Planning Policy 1 July 2014

## 1. Purpose

The purpose of this guideline is to assist local governments in appropriately reflecting the State Planning Policy (SPP) state interest—mining and extractive resources in local planning instruments and where the state interest has not been appropriately reflected in a local planning instrument, through development assessment. The guideline is also to be used to ensure decisions around the designation of land for community infrastructure appropriately reflect the state's interest in mining and extractive resources.

## 3. Development assessment

- (1) The development ensures that:
  - (a) for development within a resource/processing area for a KRA—the undertaking of that existing or future extractive industry is not significantly impeded, and
  - (b) sensitive land uses are avoided within the separation area for a resource/processing area of a KRA, and
  - (c) for development within a transport routes separation area of a KRA—the number of residents adversely affected by noise, dust and vibration generated by the haulage of extractive materials along the route does not increase, and
  - (d) for development adjacent to the transport route—the safe and efficient use of this route by vehicles transporting extractive resources is not adversely affected.

### Purpose

This component of the SPP is used in the assessment of applicable development applications when a local government planning scheme does not appropriately reflect the state interest—mining and extractive resources.

The outcome sought is to enable extractive industries to occur in identified KRAs and ensure that development decisions do not constrain or prevent the future extraction of those resources.

The SPP's transitional development assessment provisions apply only to extractive KRAs.

### 3.8 The dimensions of the separation area for the resource/processing area are based upon the following minimum distances—

- (a) 1000 metres where the extraction or processing of the extractive resource involves blasting or crushing (namely rock); or
- (b) 200 metres for any other extractive resource not involving blasting or crushing (namely sand, gravel, clay and soil).<sup>2</sup>

<sup>2</sup> These separation distances are based on the accumulated wisdom of other jurisdictions around Australia and overseas but more specifically the following sources. The 1000 metres separation distance for blasting operations is based on—

• Blastronics Pty. Ltd., 1999: Impact of Proposed Coomera Island Development on Nucrush Quarry. Report for Nucrush and Prodap Services. September 1999. Blastronics Systems and Services, Pty. Ltd., Brisbane. #C99084Blasting Impact Report.

The 200 metres separation distance for non-blasting operations including sand and gravel operations is based on—

• Kershaw & Co., 1996: Environmental Impact Statement – Wallace Road Sand Operation. Report for Excel Quarries Pty. Ltd. 2 vols. March 1996. Ref: 566,048. Kershaw & Co., Taringa, Queensland.

• Kershaw & Co., 1997: Environmental Impact Statement – Proposal to Rezone General Industry Zoned Land to Extractive Industry – Lot 88 Crown Plan M31114, Parish of Warner, Johnstone Road, Brendale. Report for Alberton Investments Pty. Ltd. February 1997. Ref: 502\_022. Kershaw & Co., Taringa, Queensland.

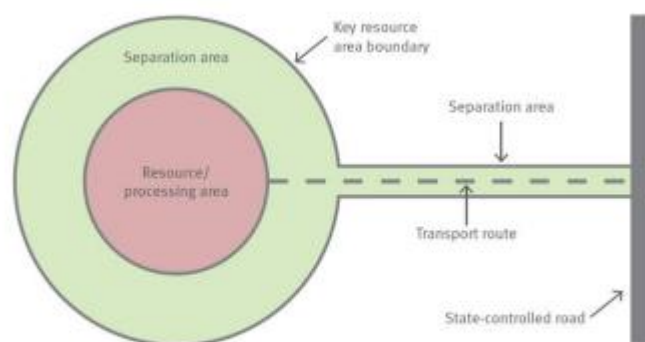
• Yastrow, P., 1990: Laku Landing Sound Level Analysis. Viewed 7 February 2006 at [www.laku.com](http://www.laku.com). Website by Laku Landing – Lake

## Attachment H1 - Table 2, KRA components

An identified KRA is made up of four components, as shown in Table 2 and Figure 2.

**Table 2: KRA components**

| Component                          | Detail  |
|------------------------------------|---|
| Resource/<br>processing area       | <p>The extent of the extractive resource and any operational areas associated with the extraction and processing of the resource.</p> <p>The boundary of the area is defined by the potential for extractive industry activities, and includes the resource area where blasting and other primary extraction would take place.</p> <p>The area can include adjacent areas where other extractive activities (such as crushing, screening and stockpiling) may occur.</p>  |
| Separation area                    | <p>The separation area is the area surrounding the resource/processing area required to maintain separation from people who may be affected by residual impacts such as noise, dust and ground vibrations of existing or future extractive operations in the resource/processing area.</p> <p>The minimum distance is 200 metres for resources that do not require blasting or crushing to extract (sand, gravel and clay) and 1,000 metres for hard rock resources where blasting and crushing of material is required.</p> <p>An extractive resource might extend beyond the boundary of the resource/processing area and, where this occurs, an extractive industry could take place in the separation area, provided that the function of the separation area is not compromised.</p> <p>In some cases the separation area may be less than the minimum distances in consideration of local features such as topography or existing development commitments for incompatible land uses.</p> |
| Transport route                    | <p>The shortest practical route used to transport extracted resources to market.</p> <p>The transport route is a road or a rail link from the boundary of the resource/processing area to a major road or railway.</p>  |
| Transport route<br>separation area | <p>The area surrounding the transport route needed to maintain separation of people from undesirable levels of noise, dust and ground vibration produced as residual impacts from the transportation of extractive material. The distance is measured 100m from the centre line of the indicated transport route for a KRA.</p>   |



**Figure 2: Components of KRAs**

Attachment H2 - Identification of a Key Resource Area does not authorise extraction and/or development approvals

business.qld.gov.au/industries/mining-energy-water/resources/quarries/key-resource-areas/development-approvals



**Queensland Government**

**Business Queensland**

## Development approvals in Key Resource Areas

### Quarries and other extractive industries

Identification of a site as a Key Resource Area (KRA) and inclusion in the State Planning Policy (SPP) does not in any way authorise the extraction of the resource nor give anyone the right to establish or operate a quarry. The SPP is designed to maintain access to resources so they can be approved under the development assessment process when they are needed.

Attachment H3 - City Plan 8.2.7.3 - Separation Area

cityplanarchive.goldcoast.qld.gov.au/pages/plan/book.aspx?exhibit=GCCC\_CityPlanV6

**8.2.7.3 Specific benchmarks for assessment**

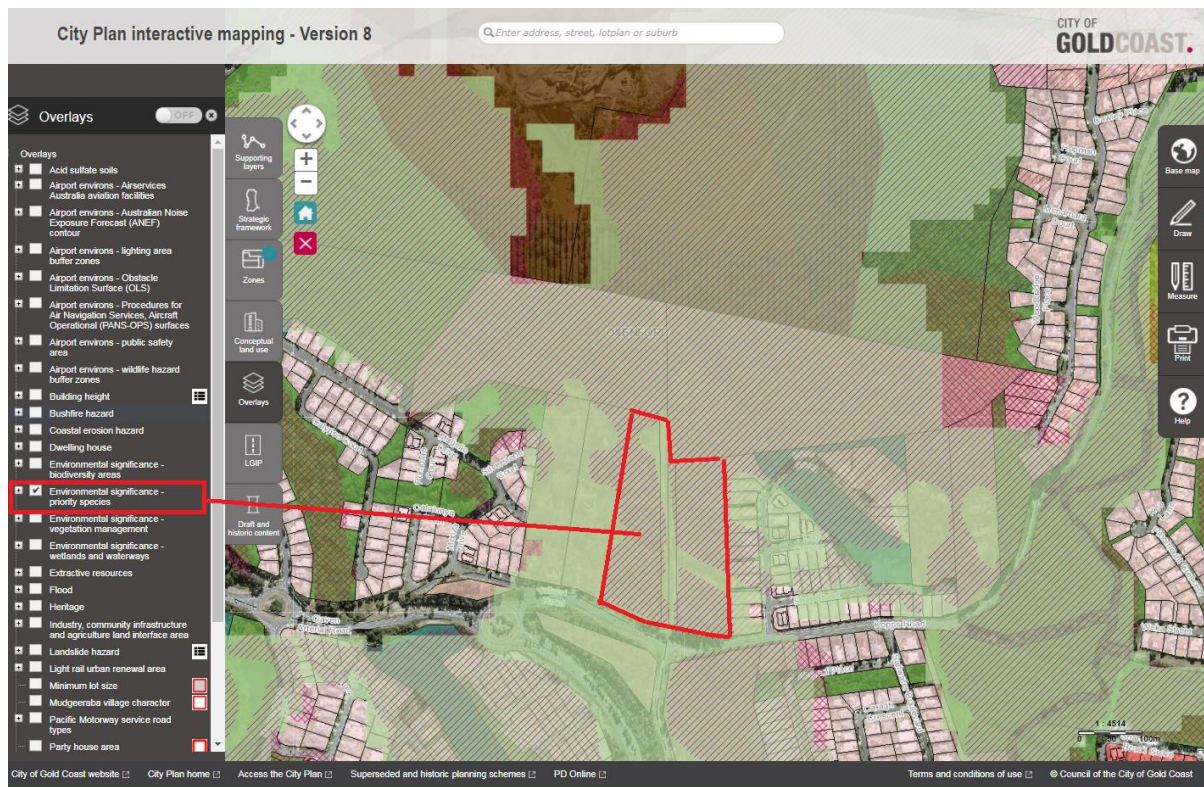
**PART B - ASSESSABLE DEVELOPMENT BENCHMARKS**

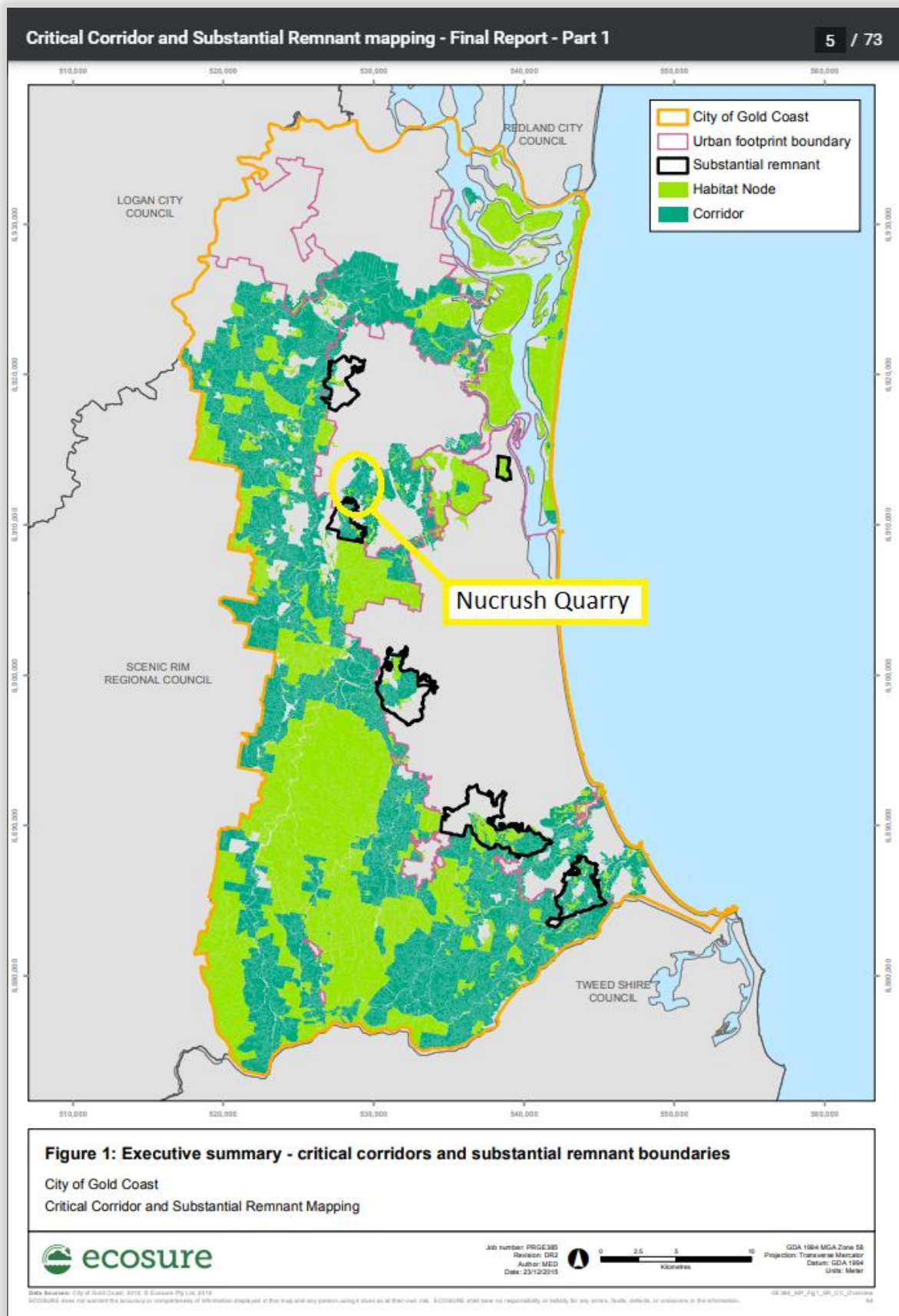
**Table 8.2.7-1: Extractive resources overlay code – for assessable development**

| Performance outcomes   | Acceptable outcomes  |
|--|--|
| <b>Separation Area and 100m Transport route separation Area</b>  |  |
| <b>PO2</b><br>Development where located within the <a href="#">Separation Area</a> and 100m Transport Route <a href="#">Separation Area</a> :<br>(a) does not compromise the current and/or future extraction, processing and transportation of resources;<br>(b) is orientated away from a Resource Area/Processing Area to minimise views/limit visual impact of <a href="#">Extractive industry</a> , and<br>(c) ensures an appropriately sized buffer between sensitive land uses, the resource/processing area and the transportation route of the KRA. | <b>A02</b><br>No acceptable outcome provided.  |
| <b>PO3</b><br>Development does not significantly impact on the amenity of existing sensitive land uses or residential zones within and external to the <a href="#">Separation Area</a> .   | <b>A03</b><br>No acceptable outcome provided.  |
| <b>PO4</b><br><b>Development:</b><br>(a) does not adversely impact on the efficient transportation of extractive material; and<br>(b) ensures safe access onto a designated transport route.   | <b>A04</b><br>The number of properties with access points to the transport route is not increased.<br><b>OR</b><br>Access points are designed to avoid adversely affecting the safe and efficient operation of vehicles transporting extractive materials. |



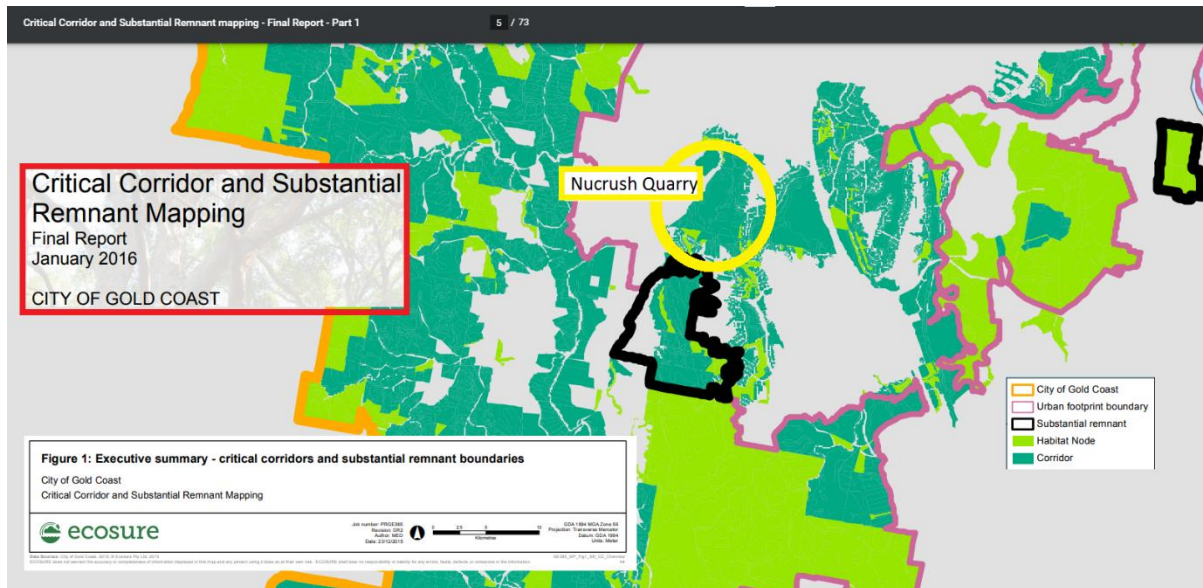
## Attachment J1 - Environmentally Significant - Priority Species







## Attachment J3 - City of Gold Coast 'Critical Corridors and Substantial remnant boundaries' (close up)



## Attachment J4 - 'Critical Corridors and Substantial remnant boundaries - Buffer areas'

Critical Corridor and Substantial Remnant mapping - Final Report - Part 1 64 / 73

### 3.6.3.1 Buffer areas

While the critical corridors were identified on the basis of the prevalent broad vegetation types within the corridor, in many instances it was not possible to locate sufficient habitat to achieve the minimum corridor width requirements (i.e. Section 2.2.2).

To address this, a supportive buffer was applied to each of the critical corridor routes within the urban footprint so that they achieve a minimum width of 500 m. This is intended to serve multiple objectives, namely to:

- Spatially demarcate sufficiently wide areas to function as regional corridors. While there might be insufficient habitat within these buffer areas at present, demarcation of the optimal corridor locations will assist with efficient direction of revegetation efforts within the regional corridors. Identification of regional scale corridors will also assist with the prioritisation of future mitigation measures to improve corridor functionality over time.
- Manage for edge effects: given that most urban corridors routes are less than 100 or 200 m wide, it becomes all the more important to provide appropriate management and education within the surrounding areas to minimise detrimental edge effects and disturbance to species potentially using the corridor. Delineation of supportive buffers outside of the critical corridor footprint will assist with focusing actions on the ground.

The 500 m width is consistent with the approach taken in previous corridor projects (i.e. Chenoweth 2009; 2010). It also aligns with the findings of the literature review; discussed in Section 2.2.1, which recommends that regional corridors be greater than 500 m wide.