

20 June 2018

RE: SSD 6334 Sutton Forest Quarry Project—EIS Submission

Dear Sir/Madam,

I am making this submission to express my concerns about the Sutton Forest Quarry Project, in relation to the broad environmental and social impacts of the project and the inadequacy of the Environmental Impact Statement (EIS) in addressing many of these issues. I am a resident of the Southern Highlands and the mother of a young family. I am also a heritage consultant with extensive experience in reviewing and assessing development applications, particularly in relation to potential cultural heritage impacts. I have also been employed in the position of Strategic Planner—Heritage at Wingecarribee Shire Council.

I have reviewed sections of the Environmental Impact Statement prepared for the project, as well as information prepared by and on behalf of the Save Our Sands Alliance in response to the EIS Exhibition for the project. The analysis presented in this documentation raises many concerns about the project that do not appear to have been adequately addressed by Sutton Forest Quarries Pty Ltd.

There are many serious issues that have been raised through analysis of the EIS that have not been adequately addressed but which present a real threat to the economic, social, cultural and health wellbeing of the surrounding communities. These issues include, but are not limited to:

- Impacts to water resources, including lowering the water table and adversely affecting bores in the surrounding areas.
- Removing sandstone that has an important role in filtering water and replacing it with Sydney fill.
- Pollution of and damage to Long Swamp and its aquifer.
- Impacts to air quality from airborne dust across populated areas.
- Adverse impacts to native flora and fauna, including endangered species, from extensive land clearing.
- Constant long term noise and light pollution, which will destroy critical habitat and severely affect the amenity of neighbouring properties.
- Substantial increase in heavy truck movements on and connecting to the Hume Highway.

Further to these many broad issues, I also do not believe that the EIS adequately addresses the potential historic heritage impacts of the project. The EIS documents on exhibition do not include a full specialist consultant report that specifically addresses the potential historical heritage impacts of the proposed development. Instead, discussion of the consideration of potential heritage impacts appears to be limited to the summary presented in Section 5.8 Historic Heritage of the main EIS report. It is not clear

whether a comprehensive assessment of potential heritage impacts was actually carried out, or whether the information was compiled but has been deliberately kept off the public record (for whatever reason). Either scenario is unacceptable.

The relevant DGRs require the preparation of a:

a Historic heritage assessment (including archaeology) which must:

- *include a statement of heritage impact (including significance assessment) for any State significant or locally significant historic heritage items; and*
- *outline any proposed mitigation and management measures (including an evaluation of the effectiveness and reliability of the measures)*

The summary presented in Section 5.8 of the EIS identifies that there are no statutory listed heritage items within or within the vicinity of the study area. The summary therefore includes only a cursory consideration of the potential heritage impacts of the proposal. However, I do not believe that this approach adequately considers the potential heritage impacts of the proposal. Drawing on my professional background in heritage management and assessment, I have extensive experience in preparing and reviewing heritage documentation. In my opinion, the EIS includes only a superficial assessment of the cultural heritage significance of the project area and the potential heritage impacts that would result from the proposed quarry project. The EIS also does not appear to contain any management framework in the event that unexpected historical archaeological remains were to be uncovered at the site during excavation or other ground disturbance works.

The historic character of the Southern Highlands is an important aspect of the region. However, the EIS does not include any consideration or discussion of the broader historical cultural landscape of this section of the Southern Highlands. The scenic character of the area is not acknowledged, nor is the presence of many established rural properties and historic towns. The EIS does not consider the heritage impact of the general erosion of the scenic, rural and historic character of the surrounding area that would result from the proposed quarry and associated operations and infrastructure.

There are a number of properties and areas in the vicinity of the proposed development that would be affected by the project that contribute to the historic character of the region but that are not formally listed as heritage items. The EIS is silent on the contributory role that these places have in the broader cultural landscape. The EIS also does not consider the impact of associated environmental damage such as water drawdown on the affected rural properties that contribute to the cultural landscape. This is a substantial oversight of the EIS that should be revisited prior to any approval of the Sutton Forest Quarry Project, to ensure that the cumulative heritage impacts of the project are well understood by the community, relevant consent authorities and other stakeholders.

With such a broad range of issues of genuine concern, and the apparent inadequacy of the EIS documentation in relation to these and many other issues, I request that this project is not given

approval until these issues are adequately addressed and mitigated, and the economic, social, cultural and health wellbeing of the surrounding communities that would be affected by the project are given adequate consideration.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Anne Mackay', with a stylized, cursive script.

Anne Mackay