

Dr Mehreen Faruqi
Greens Member of the NSW Legislative Council



NSW Office of Planning and Environment
Att: May Patterson
may.patterson@planning.nsw.gov.au

3 July 2018

Dear Ms Patterson,

Submission re the Sutton Forest Quarry Project SSD 6334

Thank you for the opportunity to make a submission on the Sutton Forest Quarry Project and I make this submission in my capacity as Greens NSW Spokesperson for the Environment. I understand that the deadline for this submission has passed, but I request that it be considered as a late submission.

Please find below some concerns about this proposal.

1. Impact on groundwater

The aquifer in this location is a vital resource for both human and natural systems. There are 43 registered bores within a 2.4km radius of the proposed mine site which serve a range of industrial and irrigation purposes. There are real risks of damage to the aquifer by this massive sand mine proposal and given the heavy reliance on the aquifer by a range of agricultural and industrial users, this would have substantial consequences for a range of businesses and individuals as well as for the environment.

The modelling provided in the Environmental Impact Statement (EIS) indicates expected drops in the water table, but fails to take into account the widely varying depths at which water is extracted from the aquifer by other users. This failure calls into question the modelling's description of potential impacts on other users.

There have been serious questions raised about the reliability of groundwater modelling obtained from nine bores located within the proposed quarry site. I understand that four of the boreholes were damaged and leaking during the 20 months data was collected, thus it is concerning that the EIS still includes this data.

It should also be noted that the water study within the EIS does not appear to address the issue of increased permeability of the sandstone as a result of blasting, possibly resulting in more water entering the pit.

There should be no reliance by the proposed Quarry on the Highlands Source water pipeline. The Highlands Source has a very specific public interest role in maintaining an emergency water supply for the residents of Goulburn, and should not be considered for potential diversion for this private commercial proposition.

2. Community consultation

The 28-day exhibition period is inadequate for a thorough and informed assessment of the sand quarry proposal by affected residents and businesses, especially given the Environmental Impact Statement alone runs to over 30 parts. Given the scale of this proposal, and the cumulative impact on the local area when the Sutton Forest mine is considered alongside the Green Valley sand quarry, the exhibition period should have been extended at the request of residents who needed more time to reach an appropriately informed position on the matter.

3. Impacts on local groundwater-dependent ecosystems

There are a number of areas of vegetation inadequately mapped in the EIS including listed Endangered Ecological Communities adjacent to the proposed mine. The lack of Groundwater Dependent Ecosystems (GDEs) such as swamps and wetlands identified in the EIS is extremely concerning, given the likelihood of their occurrence in areas where the aquifer is sufficiently elevated.

The acknowledged impacts on Long Swamp are inadequately detailed. Vegetation clearing and the disturbance of soil and rock can lead to the contamination and availability of water, but the extent, value and consequences for the ecosystems of projected losses are missing from the EIS. The limited water sampling (two only) means that the nature and location of the sources of groundwater for Long Swamp are not included.

While the EIS includes descriptions of dams and drains, questions remain about the adequacy of these facilities in extreme weather events which are increasingly likely in a changing climate.

4. Impacts on biodiversity

The proposed removal of 63.2 ha of native vegetation on the site including habitat essential for local koala, Glossy black cockatoo and Regents Honeyeater populations contradicts the stated desire of the Office of Environment and Heritage to protect and conserve land within the Great Western Wildlife Corridor (GWWC). It is within the mine site region that fragmentation of the GWWC is most significant. The Corridor serves a vital ecological purpose, but is most at risk around the Sutton Forest area.

Nine threatened species exist within the Site, including the Powerful owl, Gang-gang cockatoo, Glossy black cockatoo, Scarlett Robin, Varied sitella, Squirrel Glider, Eastern bentwing bat, Greater broad-nosed bat and Large-eared pied bat. The nocturnal species in this list are likely to suffer considerable impact from the 24/7 industrial light and noise pollution from the mine, something inadequately considered in the EIS and documentation supporting an application for Director Generals' Requirements.

I do not have confidence that any proposed biodiversity offset could compensate for such a loss.

5. Social impacts

If approved, the Sutton Forest sand mine could excavate 29 million tonnes of sand over a lifetime of thirty years, with a fifteen-year extension.

Large stockpiles, 3.8 metre-high barriers and the noise of up to fifty trucks in any one hour on local roads will impact the wellbeing of large numbers of people in the surrounding area. The amenity of properties adjacent to the mine will be severely affected and the peace and tranquility of Penrose Park is likely to be lost, given statements in the EIS that blasting will take place possibly just 0.5km from the Park.

The 24/7 nature of this commercial mining operation is also likely to have consequences for the community in terms of noise from grinding, blasting and truck movements. Industrial light pollution is likely to have detrimental effects on the physical and mental wellbeing of the surrounding community.

6. Impacts of traffic generation

Access to and from the quarry would be from the highway via a proposed quarry interchange and a 1.4km quarry access road to be constructed. The increase in traffic from the combined effects of construction

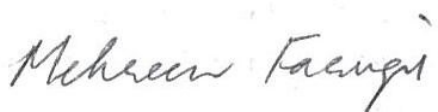
vehicles, employees' vehicles and transportation of quarry material is likely to have a highly deleterious effect on local road surfaces, as well as the amenity of neighbouring homes and properties.

It is projected that there will be an daily average of 134 truck movements carrying 67 loads, with up to 332 movements and 166 loads – an unacceptable impost on the community in terms of amenity, safety and environmental damage from carbon emissions. As stated in the EIS, up to 50 truck movements (25 loads) would occur during any one hour, with the most likely period for this level of truck traffic between 4:00am and 6:00am. The impact on surrounding residents from this scale of traffic movement would be severe.

I believe this proposal does not meet the requirements of Ecologically Sustainable Development principles, including the precautionary principle. The potential negative impacts on the community and the environment are significant, and in some cases can be irreversible. Therefore, I oppose this proposal.

Thank you for the opportunity to comment on this proposal. Please do not hesitate to contact me or my office for further information.

Kind Regards

A handwritten signature in dark ink, reading 'Mehreen Faruqi' in a cursive script.

Dr Mehreen Faruqi MLC

Greens NSW Environment Spokesperson.