



**NAME REDACTED**

**OBJECT**

Submission ID: 216891

Organisation: <i>N/A</i>	Key issues: <i>Social impacts, Traffic, Other issues</i>
Location: <i>Redacted</i>	
Attachment: <i>Attached overleaf</i>	

Submission date: 11/21/2024 10:41:40 PM

*Please see attached document.*

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Items Listed by Local Government

Item Name	Location	Item Type	Local Govt Area	Record Owner
Annabelle's Cottage (former Gundagai Cottage)	Illawarra Highway MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Argyle and Browley Streets Heritage Conservation Area	MOSS VALE NSW 2577	Unknown	Wingecarribee	LGOV
Argyle House	479 Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Argyle House excluding porches	Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	GAZ
Argyle Street North Heritage Conservation Area	MOSS VALE NSW 2577	Unknown	Wingecarribee	LGOV
Austermere, (Former SCEGGS School) House and Grounds	Suttor Road MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Barn, (The) (Former Throsby Park Barn)	62 Church Road MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Bong Bong Common Historic Group	Moss Vale Road MOSS VALE NSW 2577	Archaeological-Terrestrial	Wingecarribee	LGOV
Bonheur	Oldbury Road MOSS VALE NSW 2577	Built	Wingecarribee	GAZ
Browley and outbuildings	Oldbury Road MOSS VALE NSW 2577	Built	Wingecarribee	GAZ
Catholic Presbytery	Garrett Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Cherry Hinton House	35 Valetta Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Christ Church	Argyle Street (corner Church Street) BONG BONG NSW 2576	Built	Wingecarribee	LGOV
Coach House Antiques	10 Yarrowa Street (corner Argyle Street) MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Cottage	15 Broughton Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Cottage	598 Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	GAZ
Cottesbrooke House	9 Caber Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Council Chambers (former)	Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	GAZ
Courthouse	Argyle Street MOSS VALE NSW 2577	Unknown	Wingecarribee	GAZ
Dormie House Guest House	50 Arthur Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
East Street Heritage Conservation Area	MOSS VALE NSW 2577	Unknown	Wingecarribee	LGOV
Federation Cottage	27 Spring Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Federation House	2-4 Lovelle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Glendalough	598 Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Gundagai Cottage	Robertson Road MOSS VALE NSW 2577	Built	Wingecarribee	GAZ
Hereford House	465 Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Highfield including Highfield Lodge, gates and picket fence	Oldbury Road MOSS VALE NSW 2577	Built	Wingecarribee	GAZ
Interwar Bungalow	21 Yarrowa Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Interwar Transitional Bungalow	22 Yarrowa Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
J M Alcorn Memorial	Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Jemmy Moss Inn	481 Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Kalaurgan House	24 Browley Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Leighton Gardens	Argyle Street MOSS VALE NSW 2577	Landscape	Wingecarribee	LGOV
Leighton Gardens Pavilion	Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Lynton	618-620 Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Mali Brae Hatch Cottage and Outbuildings	429 Nowra Road MOSS VALE NSW 2577	Complex / Group	Wingecarribee	LGOV
Mill, (The)	1 Throsby Park Road MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Moss Vale Court House	356-364 Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Moss Vale Courthouse	Argyle Road MOSS VALE NSW 2577	Built	Wingecarribee	SGOV
Moss Vale Post Office (Former)	249-251 Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Moss Vale Public School	12 Browley Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Moss Vale Public School	12 Browley Street MOSS VALE NSW 2577	Complex / Group	Wingecarribee	SGOV
Moss Vale Public School - Buildings B00B and B00C	12 Browley Street MOSS VALE NSW 2577	Built	Wingecarribee	SGOV
Moss Vale Rail Booking Office	Lackey Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Moss Vale Rail No 2 Down Platform	Lackey Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Moss Vale Rail Platform Building	Lackey Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Moss Vale Rail Refreshment Building	Lackey Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Moss Vale Rail Signal Box	Lackey Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Moss Vale Rail Underbridge	Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Moss Vale Rail Underbridge (Argyle St)	Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	SGOV
Moss Vale Railway Group	Argyle Street MOSS VALE NSW 2577	Complex / Group	Wingecarribee	LGOV
Moss Vale Railway Precinct	Lackey Street MOSS VALE NSW 2577	Built	Wingecarribee	SGOV
Moss Vale Railway Precinct	Lackey Road MOSS VALE NSW 2577	Built	Wingecarribee	SGOV
Moss Vale Railway staff residence	MOSS VALE NSW 2577	Built	Wingecarribee	GAZ
Moss Vale Railway Station, platform & building	MOSS VALE NSW 2577	Complex / Group	Wingecarribee	GAZ
Moss Vale School Of Arts (Former)	471 Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Moss Vale Showground	18-46 Robertson Road MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Moss Vale Station Master's Residence (Former)	247 Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Mount St Mary Dominican Convent & Chapel	Main Street MOSS VALE NSW 2577	Built	Wingecarribee	GAZ
National Australia Bank (Former)	478 Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
National Australia Bank former CBC Bank	Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	GAZ
Oldbury	Oldbury Road MOSS VALE NSW 2577	Built	Wingecarribee	GAZ
Park Hill House	48 Narellan Road MOSS VALE NSW 2577	Built	Wingecarribee	LGOV
Pavilion, Leighton Gardens	Argyle Street MOSS VALE NSW 2577	Built	Wingecarribee	GAZ
Peppers Manor House	Kater Road MOSS VALE NSW 2577	Built	Wingecarribee	LGOV

<b>Peppers Manor House Gardens</b>	Kater Road MOSS VALE NSW 2577	Complex / Group	Wingecaribee	LGOV
<b>Peppers Manor House Group (Former Mt Broughton)</b>	Kater Road MOSS VALE NSW 2577	Complex / Group	Wingecaribee	LGOV
<b>Peppers Manor House Outbuildings</b>	Kater Road MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>Public School</b>	Browley Street MOSS VALE NSW 2577	Unknown	Wingecaribee	GAZ
<b>Redbraes House and Garden</b>	47 Valetta Street MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>Sandstone Kerb and Guttering</b>	Arthur Street MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>School of Arts (former)</b>	Argyle Street MOSS VALE NSW 2577	Built	Wingecaribee	GAZ
<b>Semi-detached Houses</b>	587 and 587A Argyle Street MOSS VALE NSW 2577	Unknown	Wingecaribee	LGOV
<b>St Andrew's Presbyterian Church</b>	7 Browley Street MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>St John's Anglican Rectory (Former)</b>	26 Wyatt Street MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>St John's Anglican Church</b>	16 Waite Street MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>St Paul's International College (Former Dominican Convent)</b>	463 Argyle Street MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>St Paul's Roman Catholic Church</b>	Garrett Street MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>St. John's Anglican Church</b>	Waite Street MOSS VALE NSW 2577	Unknown	Wingecaribee	GAZ
<b>Throsby and Arthur Streets Heritage Conservation Area</b>	MOSS VALE NSW 2577	Unknown	Wingecaribee	LGOV
<b>Throsby Cottage</b>	Church Road MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>Throsby Cottage and former stables</b>	Robertson Road MOSS VALE NSW 2577	Built	Wingecaribee	GAZ
<b>Throsby Manor, (Former Council Chambers)</b>	1A Throsby Street MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>Throsby Park</b>	CHURCH RD MOSS VALE NSW 2577	Landscape	Wingecaribee	SGOV
<b>Throsby Park (Homestead Garden)</b>	Throsby Park Road MOSS VALE NSW 2577	Landscape	Wingecaribee	LGOV
<b>Throsby Park Group</b>	Throsby Park Road MOSS VALE NSW 2577	Complex / Group	Wingecaribee	LGOV
<b>Throsby Park Group</b>	Robertson Road MOSS VALE NSW 2577	Unknown	Wingecaribee	GAZ
<b>Throsby Park Heritage Conservation Area</b>	MOSS VALE NSW 2577	Unknown	Wingecaribee	LGOV
<b>Throsby Park House, Grounds and Outbuildings</b>	3 Throsby Park Road MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>Throsby Park Mill and Outbuildings (Duplicate of 2680417)</b>	Throsby Park Road MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>Throsby Park Stables</b>	Throsby Park Road MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>Tudor House Preparatory School</b>	MOSS VALE NSW 2577	Built	Wingecaribee	GAZ
<b>Tudor House School</b>	Illawarra Highway MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>Valetta Street Heritage Conservation Area</b>	MOSS VALE NSW 2577	Complex / Group	Wingecaribee	LGOV
<b>Victorian Shop, Painted Wall Signs and House</b>	561 Argyle Street MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>Victorian Worker's Cottage</b>	7 Throsby Street MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>Whitley including outbuildings, entrance gate and garden</b>	Oldbury Road MOSS VALE NSW 2577	Unknown	Wingecaribee	GAZ
<b>Whytes Shop</b>	426 Argyle Street MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>Willow Grange House and Grounds</b>	32-34 Berrima Road MOSS VALE NSW 2577	Built	Wingecaribee	LGOV
<b>Woodside and garden north of Tudor House</b>	Illawarra Highway MOSS VALE NSW 2577	Built	Wingecaribee	GAZ
<b>Woodside Garden</b>	69 Farnborough Drive MOSS VALE NSW 2577	Complex / Group	Wingecaribee	LGOV
<b>Woodside House</b>	69 Farnborough Drive MOSS VALE NSW 2577	Built	Wingecaribee	LGOV

**21/11/2024**

I strongly object to the proposed plastic recycling refinery in Moss Vale on behalf of my family and the future generations of my family. My family home is in Moss Vale less than ten minutes from the proposed location of the Plasrefine factory site at 74-76 Beaconsfield Road Moss Vale.

We moved to the Southern Highlands to enjoy the beautiful surroundings, the unspoiled nature of the district and the rural atmosphere and to enjoy the benefits of living in a quiet historical town. The construction of this factory will detrimentally impact our experience of the area and have a negative impact on our family home for generations to come. It will poison our environment and increase the volume of trucks and traffic through our area. Our peace will be disturbed by the number of trucks that will be brought in by the operation of this factory and this causes me a great deal of stress and concern. This proposal will not only impact those who struggle to cope with environmental noise but also the elderly, children and the everyday person on the street.

## **FIRE SAFETY**

There are many safety issues associated with the location of the factory. The approval of the construction of a factory three times the size of a Bunnings store that processes plastics and pollutes the air and water in our beautiful historical town is a monumental failure to recognise the significant and valuable history that our community is a steward of and frankly this should not be allowed.

Since the site is within 200 metres of residential areas, I believe that it is far too close making it a high risk of human, residential and increasing the risk to wildlife loss in the event of fire. Plastic recycling refineries are usually classed as heavy industrial, due to risk of air and water pollution in event of failure of safety processes and extremely high fire risk. There have been over 19 devastating fires associated with plastics facilities since 2019 in Australia alone. The question of fire is not if, but when.

Our local fire services are not equipped to deal with inevitable industrial fires caused by such a facility. Moss Vale station is unmanned and entirely voluntary, with only one fire truck. There are only 4 trucks and 1 hazmat vehicle in the Highlands, the others are 76km away at Campbelltown.

Fires that occur in these facilities are common with temperatures reaching 1000 degrees centigrade. Our area has only just begun to recover from out-of-control fires that occurred in 2019. These fires were from natural causes and the impacts of them are described well in the footnoted document.<sup>1</sup> Introducing a factory which can actually cause a fire in an already bushfire prone region is a recipe for disaster.

## TOURISM AND HISTORY

Tourism is key to the continued growth and viability of our region.

The Southern Highlands is celebrated for its stunning landscapes and serene atmosphere, attracting visitors from both nearby and distant locations.

Numerous outdoor events take place throughout the region, with the Annual Tulip Time Festival being the most prominent, drawing tens of thousands of attendees annually to admire the vibrant and pristine displays of tulips. These events play a crucial role in shaping the community's identity and supporting its economy.

The establishment of a massive industrial facility contradicts the essence of our community and the fresh, clean, unique environment we have to offer.

The risk of pollution and environmental deterioration may damage our standing as a leading tourist destination, resulting in a decrease in visitor attendance and, consequently, an economic decline for our area.

A facility of this kind ought not to be situated in a region celebrated for its viticulture, agritourism, and proximity to the well-preserved Georgian village of Berrima on the Australian mainland. Such a development would have detrimental effects on the local tourism sector.

The entire Southern Highlands Area is rich in history and should be recognised for the value that it has to Australians everywhere and what it represents of the past.

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<sup>1</sup> The Impacts of Bushfire. <https://www.unep.org/news-and-stories/story/ten-impacts-australian-bushfires>

## The History of Moss Vale

Moss Vale itself is also an area of historical significance. As a country we should value our history and preserve its nature.

Moss Vale has 4 items of state significance listed on the State Heritage Register. These are:

- Moss Vale Railway Station
- Moss Vale Rail Underbridge
- Christ Church Church Yard and Cemetery
- Throsby Park Historic Site

There are also 102 Items of local significance on the Register. This is a partial indication of the historical value of the area.

The screenshot shows the NSW State Heritage Inventory search interface. At the top, there is a search bar with the following fields: 'Item Name', 'Street Name', 'MOSS VALE N x', and 'Local Govt Area'. A yellow 'VIEW RESULTS' button is visible. Below the search bar, there are options to 'View NSW Heritage' with links for 'Map', 'A-Z', and 'Statutory list'. The main content area displays three sections of heritage items:

- Section 1: Aboriginal Places listed under the National Parks and Wildlife Act**  
Contains Aboriginal Places declared by the Minister for the Environment under the National Parks and Wildlife Act. This information is provided by the Heritage NSW. **0 items**
- Section 2: Items listed under the NSW Heritage Act**  
Contains heritage items listed by the Heritage Council of NSW under the NSW Heritage Act. This includes listing on the State Heritage Register, an Interim Heritage Order or protected under section 136 of the NSW Heritage Act. This information is provided by the Heritage NSW. **4 items**
- Section 3: Items listed by Local Government and State Agencies**  
Contains items listed by local councils on Local Environmental Plans under the Environmental Planning and Assessment Act, 1979 and State government agencies under s.170 of the Heritage Act. This information is provided by local councils and State government agencies. **102 items**

At the bottom of the page, there are links for 'Contact Us', 'FAQ', and 'Privacy Policy', and a version number 'Version: 1.3.7.0'.

There are undoubtedly items of aboriginal heritage also recorded but I understand that many are not publicly recorded for cultural reasons. However I do have questions about the extent to which this has been considered in the Southern Highlands.

*“Christ Church Bong Bong was erected by the main landholder, Charles Throsby, nephew and heir to the pioneer.*

*The first church in the Highlands, Christ Church served as the focus of worship for settlers and visitors, and many of the earliest pioneers are buried in its graveyard”*

*Source: Highlands NSW Website*



Christ Church Bong Bong, 1845.<sup>2</sup>



Kalaorgan. c.1848.

*A few years later, a boarding school was erected on part of Browley Farm ("Kalaorgan" House c.1848) on land granted by Waite (now Broulee Street, next to the Public School).<sup>3</sup>*

*Source: Highlands NSW Website*

In addition to this, the WSC council conducted a community heritage study which they published in 2024. This identifies various additional sites that should have also been added to this register. A link to this heritage study is [here](#) and it should be considered at depth to understand the significance of the heritage that exists in the Southern Highlands as a whole. The link below relates only to Moss Vale.

I note that I have only highlighted a few of these heritage items for the IPC to consider the impact on the area of making it into an industrial area for a factory such as Plasrefine. This is not a full picture of the heritage that exists in the Southern Highlands.

### The History of Berrima

The Highlands NSW website indicates that in the 1960s, there was sufficient local concern to preserve the heritage of Berrima. A local society was formed to ensure that the beautiful buildings and the integrity of the village could be saved for future generations. In 1960, those people had some foresight to preserve something very special in their environment.

The village has since prospered as a favoured tourist destination for hundreds of thousands of people who now were only less than two hours drive away on the freeway.

Consider the following comments in italics as found on these local websites.

*“Berrima township (NSW) was founded in May 1831 on a site chosen by Major Thomas Mitchell when he laid out a new line of road to link Sydney with Port Phillip (Melbourne). It was to be the main administrative centre south of Sydney, complete with gaol and courthouse, and a service hub for travellers and local settlers.”*

*Today Berrima is a village, sustained largely by tourism. It has been by-passed by major roads and the rail-line and, in part because of this, retains much of its original layout, its courthouse and gaol and several of its earliest residences.<sup>4</sup>*

### The History of Bong Bong Common

*“The first European settlement on the Southern Highlands of New South Wales was established beside a pebbly ford across the Wingecarribee River on the old Argyle Road, which ran from the newly settled land south of Camden through Bong Bong to Sutton Forest then on to Goulburn.*

*“The entire site of this settlement has now been preserved for the future as public land within the Bong Bong Common and is considered worthy of state significance for its unique heritage values”*

Apart from the heritage importance of the site, Bong Bong Common<sup>5</sup> serves as a valued public green space between Bowral and Moss Vale for everyone to enjoy, be they walkers or cyclists using the Bong Bong Track, or people just wanting some quiet time in the natural world beside the river



The History of Joadja

*“Joadja Distillery is located in the Southern Highlands of New South Wales, Australia. The town of Joadja was established in the late 1870’s by the Australian Kerosene Oil and Mineral Co”*

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<sup>4</sup>Highlands NSW Website: <https://berrimahistory.com/>

<sup>5</sup> Bong Bong Common History:  
<https://www.wsc.nsw.gov.au/files/assets/public/v/1/community/community/bong-bong-common-booklet-2021.pdf>

## Aboriginal and Cultural Heritage of the Area

The Table below is a section extracted from the Department of Planning, Housing and Infrastructure State Significance Assessment Report. The full report is linked in the footnote<sup>6</sup>

Aboriginal heritage	
<ul style="list-style-type: none"> <li>The site has the potential to impact Aboriginal Cultural Heritage during bulk earthworks and construction. The EIS and RTS included an Aboriginal Cultural Heritage Assessment Report (ACHAR), prepared in accordance with the relevant guidelines and policies.</li> <li>The archaeological investigation, undertaken in consultation with Registered Aboriginal Parties (RAPs) recorded 14 artefacts, across six sites. The ACHAR concluded there was low artefact density and no subsurface archaeological deposits of conservation value within the areas to be impacted by the development.</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>prepare and implement an ACHMP in consultation with the RAPs and to the satisfaction of Heritage NSW including:                             <ul style="list-style-type: none"> <li>procedures for unexpected finds</li> </ul> </li> </ul>

Moss Vale Plastics Recycling Facility (SSD-9409987) Assessment Report | 51

Findings and conclusions	Recommended conditions
<ul style="list-style-type: none"> <li>To manage any residual impacts on Aboriginal heritage, the Applicant committed to a range of measures including the preparation of an Aboriginal Cultural Heritage Management Plan (ACHMP), an attempt to locate the isolated finds and the reburial of excavated artefacts in consultation with the RAPs.</li> <li>Public submissions raised concerns over potential impacts on the Aboriginal cultural sites and a perceived lack of consultation. However, the Department notes the RAPs were consulted in accordance with the guidelines and the ACHAR assigned the artefacts a low scientific value.</li> <li>Heritage NSW advised it supported the proposed mitigation measures and recommended several conditions, including the continued involvement of the RAPs, salvage and appropriate long- and short-term management of items.</li> <li>To ensure impacts are managed in accordance with the ACHAR, the Department has incorporated these measures into the recommended conditions.</li> <li>On consideration of the investigations and advice from Heritage NSW, the Department's assessment concludes the development would not significantly impact Aboriginal cultural heritage and any unexpected finds would be appropriately managed.</li> </ul>	<ul style="list-style-type: none"> <li>a program of surface collection including an attempt to locate isolated finds MVRec IF1, BR IF1 and BRIF2</li> <li>measures for the appropriate management of salvaged Aboriginal objects and sites</li> <li>update the AHIMS database</li> </ul>

I wish to contrast the conclusion of this report that indicates that there is a low cultural heritage value above by also drawing your attention to some aspects of the public meeting transcript from the third day of the public hearing the full detail of this is noted in the footnotes.

As far as it relates to Aboriginal and Cultural Heritage of the Area. I was quite concerned when I read this document. <sup>7</sup> particularly the paragraph below.

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<sup>6</sup> Department of Planning, Housing and Infrastructure:

<https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2024/10/moss-vale-plastics-recycling-facility/case-referral-documents-from-dphi/assessment-report.pdf>

<sup>7</sup>Day 3 Public Meeting Transcript. <https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/transcripts-and-material/2024/moss-vale-plastics-recycling-facility/day-3-public-meeting-transcript-moss-vale-plastics-redacted.pdf>

*“An Aboriginal cultural heritage management plan for this project **has been delayed until after potential approval, which feels more about compliance than genuine preservation.** And while the Department of Planning, Housing and Infrastructure has suggested conditions to address community concerns around this and many other issues, it remains unclear how these conditions would be enforced post approval. The environmental, health and cultural risk of this project are not abstract possibilities. They are real and they are present”*

The Department of Planning Housing and Infrastructure report concludes that 14 items of significance were located over 6 sites and the overall impact is low.

The report by Biosys also states the following which I have extracted in a snip below.

### **3.2.3 AHIMS site analysis**

A search of the AHIMS database (Client Service ID: 595862) identified 49 Aboriginal archaeological sites within a 10 by 10 kilometre search area, centred on the study area. Two of these registered sites are located within the study area, AHIMS 52-4-0386/BR-IF1 and AHIMS 52-4-0387/BR-IF2, and three are located within 100 metres (Figure 7). AHIMS search results are provided in Appendix 1. Table 2 provides the frequencies of Aboriginal site types in the vicinity of the study area. The mapping coordinates recorded for these sites were checked for consistency with their descriptions and location on maps from Aboriginal heritage reports where available. These descriptions and maps were relied where notable discrepancies occurred.

It should be noted that the AHIMS database reflects Aboriginal sites that have been officially recorded and included on the list. Large areas of NSW have not been subject to systematic, archaeological survey; hence AHIMS listings may reflect previous survey patterns and should not be considered a complete list of Aboriginal sites within a given area. Some recorded sites consist of more than one element, for example artefacts and a modified tree, however for the purposes of this breakdown and the predictive modelling, all individual site types will be studied and compared. This explains why there are 51 results presented here, compared to the 43 sites identified in AHIMS.

We speak a lot about paying respect to traditional custodians of our land. However if there has been a delay in the creation of an Aboriginal Cultural Heritage Management Plan (ACHMP) until after potential approval, it strikes me as a form of paying lip-service to respect to the traditional custodians. The approval should be subject to the creation of a full ACHMP.

In 2018. Biosys produced a report in relation to the Shoalhaven and this also looked at Moss Vale Road. In their 2018<sup>8</sup> report, they made the following observations in the snip below.

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<sup>8</sup>TAYLORS LANE STUDY BY BIOSYS:

[https://doc.shoalhaven.nsw.gov.au/LinkGeneratorAPI/record/7204168/preview\\_latest\\_final\\_version\\_pdf](https://doc.shoalhaven.nsw.gov.au/LinkGeneratorAPI/record/7204168/preview_latest_final_version_pdf)

## Extract from 2018 Report on TAYLORS LANE by BIOSYS.

This extract discusses the significance of assessing sites in connection to a whole rather than in isolation. Yet the Technical Report 8 commissioned by GHD does not appear to do this.

In addition to the previously outlined heritage values, the OEH *Guidelines to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011) also specify the importance of considering cultural landscapes when determining and assessing Aboriginal heritage values. The principle behind a cultural landscape is that 'the significance of individual features is derived from their inter-relatedness within the cultural landscape'. This means that sites or places cannot be 'assessed in isolation' but must be considered as parts of the wider cultural landscape. Hence the site or place will possibly have values derived from its association with other sites and places. By investigating the associations between sites, places, and (for example) natural resources in the cultural landscape the stories behind the features can be told. The context of the cultural landscape can unlock 'better understanding of the cultural meaning and importance' of sites and places.

Although other values may be considered – such as educational or tourism values – the two principal values that are likely to be addressed in consideration of Aboriginal sites and places are the cultural/social significance to Aboriginal people and their archaeological or scientific significance to archaeologists and the Aboriginal community. The determinations of archaeological and cultural significance for sites and places should then be expressed as statements of significance that preface a concise discussion of the contributing factors to Aboriginal cultural heritage significance.

### 5.2 Cultural (social significance) values

Cultural or social significance refers to the spiritual, traditional, historical and/or contemporary associations and values attached to a place or objects by Aboriginal people. Aboriginal cultural heritage is broadly valued by Aboriginal people as it is used to define their identity as both individuals and as part of a group (DECCWa 2010 p.iii). More specifically it provides a:

- "connection and sense of belonging to Country" (DECCW 2010a p.iii).
- Link between the present and the past (DECCWa 2010 p.3).
- A learning tool to teach Aboriginal culture to younger Aboriginal generations and the general public (DECCWa 2010 p.3).
- further evidence of Aboriginal occupation prior to European settlement for people who do not understand the magnitude to which Aboriginal people occupied the continent (DECCWa 2010 p.3).

It is acknowledged that Aboriginal people are the primary determiners of the cultural significance of Aboriginal cultural heritage.

## Further Questions

The Independent Planning Commission is requested to make a serious determination as to whether the conclusion in the above table in its report is correct.

I wish to propose that IIPC ask the following further questions?

- Has the Aboriginal heritage of the whole of the Southern Highlands been considered at any length previously?
- Is it reasonable to make a conclusion on the Beaconsfield site in isolation or should the entire area of Moss Vale and the Southern Highlands also be considered?
- Is it reasonable that there are no Aboriginal places of historical significance on the State heritage register in Moss Vale? Is the reason for this protection of Aboriginal site/privacy issues or simply either neglect or oversight to record such sites?

- Has the effort made to identify such sites been substantial and does it show sufficient respect to the traditional custodians?
- The report for the current Plasrefine project was created just after Covid 19 in 2021. Was the response from the Registered Aboriginal Parties (RAP's) an indication of true intent to participate or was it impacted by fears of getting/passing on the Covid-19 virus?
- Does the Commission understand from the report how the applicant proposes to continue its engagement with RAP's in Moss Vale?

When we compare reports written in 2018 to the current proposal report, what might explain the differences between the two reports?

A general observation that I made was that similar reports on Moss Vale in 2018 and before seem to highlight the significance of Moss Vale to a greater extent than the current report<sup>9</sup> on the IPC website.

What conflicts of interest have been declared in relation to the engagement of the consultant if any who wrote this report and has there been any understanding from the commission of the revenue received by the consultant from GHD in fees/incentives in order to create this report?

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<sup>9</sup> Technical Report 8 - Aboriginal Cultural Heritage Assessment  
Report <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9409987%2120220127T045241.562%20GMT>



History is fragile and our sense of history and tourism that results from it will be significantly impacted if a plastics refinery is allowed to be set up in the Moss Vale area.<sup>10</sup>

People visit areas of historic significance to move away from the busy activities of their lives in cities and reflect on the past.

The past in order to be preserved for future generations requires firstly appropriate recognition of its significance and secondly a considerable and meaningful effort to protect it. Moss Vale is not the appropriate site for this Plasrefine plastic recycling plant.

Please consider the significant impact to many local businesses and residents of introducing this ill-advised development into the area.

The entire nature and character of our beautiful town will be destroyed for the short-term thinking of placing a plastics refinery on an inappropriate site.

Ruby Chandraraj

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<sup>10</sup>Joadja Town Website: <https://www.joadjatown.com.au/about>

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