Opposition to the Hume Coal Project EIS SSD 7172

I have been a resident of Bundanoon for 11 years, after having been a regular visitor to the Southern Highlands for over 33 years previously. I used to drive down from Sydney specifically to cycle along a local road because of the particularly unspoilt, rural nature of the area.

I wholly reject the notion that approval of the Hume Coal mine will not have significant negative impacts on this unique area, and impact on choices made by tourists, employers and investors. The Hume Coal EIS implies that tourism in the Southern Highlands is not a significant driver of the local economy and that the mine is needed for jobs. This is both inaccurate and totally misleading.

An article printed in the Guardian in the United Kingdom by Christopher Knaus on Thursday 27 April 2017, reported on the information meeting about Hume Coal held for the local community in Exeter Hall.

"Hume Coal mine would threaten water and net just \$6m in royalties a year for NSW

...It was also revealed on Wednesday night that the project would give the state government just \$120m royalties over the 19-year life of the mine. That's an average of about \$6.3m a year in today's dollars."

This \$6.3m royalty figure compares to \$261million generated annually by visitors to the Southern Highlands. (see Footnote 2 quoted below)

The Hume Coal Project EIS SSD 7172 **must be rejected** to protect the current amenity and huge potential of the local diversified tourist and agricultural economy and the future environment and health of the people of the Southern Highlands and the many visitors who contribute to the State and National economy by coming here.

Hume Coal jeopardises the Southern Highland's tourism appeal and success

As has been noted by another local resident in her submission, the Southern Highlands has one of the highest levels of tourist expenditure of any non-coastal local government area in NSW ¹. In the interests of time, I am quoting some of the excellent research she has done relating to this proposal and its impact on tourism. In the year ending June 2016, 1.7 million visitors (including 11,100 international visitors) (*to the Southern Highlands*) generated 1.2 million overnight stays comprising stays of 2 nights or more on average and annual visitor expenditure of \$261 million.²

The uniqueness of the Southern Highlands heritage and historic rural and cultural landscape has been already recognised by the National Trust and the Department of Environment & Planning in listing the many heritage properties within the area surrounding this Hume Coal proposal. This will be expanded upon in the next section.

¹Insight for Government & Business, Regional Statistics, IRIS Market Research, January 2013.

² Facts & Figures, Destination Southern Highlands drawn from Tourism Australia's National and International Visitor Data, Year Ending June 2016.

The scenic 'English' beauty of the Southern Highlands, which was remarked upon by Governor Macquarie in 1820 when he came to the area, and the visual amenity of its gardens, vineyards, national parks and reserves form part of the magnetic appeal of the highland's Top 20 attractions³. On its own, the Bowral Tulip Time Festival in September attracts an estimated quarter of a million visitors every year.⁴

The potential for disruption and damage to the area's lush green countryside, its heritage properties and gardens and vineyards because access to quality groundwater has been depleted by Hume Coal is unacceptable. Hume Coal admits that the project will affect 93 water bores owned by 71 landowners in the area - some bores drawn down by 80 metres, meaning that their livelihoods and sustainability of their properties will be seriously compromised for decades. This will prevent current or future businesses from investing in and utilising that land for other value-added purposes, such as cut flowers, boutique vegetable and wine grape growing and the marketing of specific niche tourism products such as farm tourism and Eco-tourism. ⁵2

Hume Coal risks the region's high heritage value

The area surrounding the Hume Coal development proposal represents a unique heritage and historic rural and cultural landscape. The National Trust listed Exeter/Sutton Forest as a Landscape Conservation Area because of its heritage significance as an intact pastoral and cultural landscape, and as the nucleus of the early development of the Southern Highlands, with Macquarie's New Settlers in Sutton Forest in 1819 and many properties along Golden Vale Road like Oldbury, Newbury and Golden Vale settled soon after. The landscape demonstrates 170 years of continuous agricultural activity in the area.

The Wingecarribee Heritage Study 1991

The original study for the Wingecarribee Shire was commissioned in 1990 by the Heritage Council of NSW, the Department of Planning and Wingecarribee Shire Council and was undertaken by JRC Planning Services. This study examined the heritage of the Wingecarribee Shire, provided recommendations about the conservation and management of heritage and recommended a list of heritage items, which were subsequently listed in the Local Environmental Plan (LEP) of the day: the Wingecarribee LEP 1989.

On page 82, the report notes of this surrounding land near the foot slopes of Mt Ginginbullen :

"The overall character is that of a rich and varied cultural landscape shaped by associations with early land grants and settlement of the region. Spatial organisation is large scale in relation to the rest of the study area. Variety in the landscape is a result of the range of tree species and the importance placed on plantings by landholders. There is a high degree of sense of stewardship of the landscape."

The report continues on page 83 :

³ Trip Advisor LLC Top 10 Attractions in the Southern Highlands, accessed 21st May 2017.

⁴ Insight for Government & Business, Regional Statistics, IRIS Market Research, January 2013.

⁵ Insight for Government & Business, Regional Statistics, IRIS Market Research, January 2013.

"The substantial homestead building clusters are a significant component of this pastoral landscape in harmony with its scale, richness and variety. Homesteads are discretely sited away from main access and through roads. The properties of Newbury, Oldbury and Mereworth are associated with the oldest land grants in the area dating from 1821. The buildings at Newbury and Oldbury date from early in the last century. Oldworth and Newbury have simple but significant gardens including the stately elms along the driveway at Newbury, which were amongst the earliest planted in the Sutton Forest district. Other significant building groups include Golden Vale, a neo-Georgian style stone complex dating from the 1860's with earlier outbuildings, including a former kitchen and stables.

Subdivision of the early extensive land grants in the latter half of the last century introduced a further layer of settlement and architectural style. Also in the late nineteenth century a number of large country houses were built by Sydney people including Whitley, Hillview and Summerlees. Each of these has a significant garden. Building was boosted by the leasing of Throsby Park by the Governor of NSV/ in 1865...The township of Sutton Forest dating from the 1820's, and that of Berrima established as an alternative to Bong Bong in the L830's, are part of this cultural landscape unit. Both have buildings of significance."

This is the unique heritage which has the potential to draw increasing numbers of visitors to the Southern Highlands over coming decades which the Hume Coal development would irrevocably affect and damage. The National Trust has planned to heritage list the Old Hume Highway 31 from Sydney to Canberra as a major national heritage tourist trail. This will only increase visitor numbers, over-night stays and expenditure into the local economy.

Destination Southern Highlands still needs to have a major role in promoting and developing the local heritage trails for the Southern Highlands on tourist maps to link the many heritage listed properties and museums in the area.

Hume Coal risks the region's employment in tourism and agriculture

Tourism supports 2,500 FTE jobs in a variety of occupations in restaurants and cafes, accommodation, heritage and unique places of interest, shops and rural agri-tourism, including vineyards and berry farms⁶. The Hume EIS minimised tourism as an employer because it only considered 'accommodation'. In contrast, the Australian Government's Austrade identified 707 tourism businesses in the area⁷. Indeed, the Southern Highlands outperforms the NSW state as a local employer in retail trade, manufacturing, education and training, construction, accommodation and food services, agriculture, forestry and fishing⁸ and many of the jobs in these sectors service or benefit from tourism. In 2011, the greatest increases in employment (+745 jobs) were in health care, retail and accommodation and food services⁹; which the prospect of the mine puts in jeopardy with little in return.

⁶ Facts & Figures, Destination Southern Highlands, drawn from Wingecarribee LGA implicit in the Capital Country Tourism Satellite Account 2013/14.

⁷ Australian Government Austrade, Tourism in LGAs, Wingecarribee 2013.

⁸ ABS 2011 Census, accessed from Campbell, R., & McKeon, R, Local Economic Impacts of the Hume Coal Project, Australia Institute Presentation of Data May 2017.

⁹ 'Emerging Groups', Australian Bureau of Statistics, Census of Population and Housing, 2011

Hume Coal returns little by way of employment for the risks it creates

Hume Coal expects that "on average there will be up to 275 full-time positions" over the life of the mine (19 years). This is a very poor return. It risks job losses in both tourism and agriculture so the net effect for the region could be negative. All 275 jobs will end with the mine's end and there is no guarantee a single job will be filled by a local resident. According to the NSW Minerals Council, mining only employs 81 residents of the Wingecarribee Shire.¹⁰ Thus, mining's comparative employment contribution to the Southern Highlands has been minor, but Hume Coal's potential for negative impacts will be major.

The combination of noise, coal dust, water drawdown of bores and the prospect of groundwater pollution from Hume Coal's plan to re-inject toxic coal slurry into underground voids beneath the aquifer must affect the region's scenic image and its actual and perceived environmental purity. In this sense, even the prospect of the mine can create uncertainty and that has the potential to stifle the region's future prospects in those which are currently strongest – they being manufacturing, agriculture, tourism and retail¹¹. Moreover, the Mine's use of water runs counter to the plan of Wingecarribee developed with the

Southern Highlands and Moss Vale Chambers of Commerce in their Economic Framework 2031¹² where initiatives in the 'water' sector alone provide for 300 jobs.

Hume Coal has no plan and no funds for remediation if it all goes wrong

Hume Coal presents no credible plan for remediation of the groundwater if it all goes wrong. Their plan assumes that the preventative measures they implement during mining will not fail. Moreover, it seems they would not have the funds to act as while the royalties to NSW are projected to be \$118million, these are offset by an estimated cost of \$131million for groundwater impacts. Thus, the project is deemed likely to result in a net loss of \$12.5million to the NSW community.¹³

This broad approach to assessing the true cost benefit for already diversified local economies appears endemic to this industry and bodes ill for the Southern Highlands and the taxpayers of NSW in this case. According to a report by the Auditor-General, provisions to rehabilitate mines in NSW are inadequate with some activities required for effective rehabilitation not covered or not covered adequately and while security deposits "should cover the full costs of rehabilitation" those held by the Department of Planning and the Environment "are not likely to be sufficient..."¹⁴

¹² Southern Highlands Development Framework 2031+, Development Update, February 2017

¹⁰ Lawrence Consulting UOW Centre for Small Business & Regional Research, NSW Mining Economic Impact Assessment 2014/15 Prepared for NSW Minerals Council October 2014 p.50

¹¹ Insight for Government & Business, Regional Statistics, IRIS Market Research, January 2013.

¹³ Campbell R & McKeon R, Economic Assessement of the Hume Coal Project: Discussion Paper, Australia Institute, June 2016.

¹⁴ Hannan, P 'Rehab for NSW mines comes up short: report', Sydney Morning Herald, May 12, 2017, News p.4

Many similar mines in the Hunter region have not been adequately remediated because the owner corporations have changed hands over the years, and the new owners then claim to no longer be responsible for the costs, leaving black voids of polluted water and a ruined landscape for the local population. Please don't let this happen to our unique, precious and beautiful landscape in this part of the Southern Highlands!

Other submissions will have dealt in more detail with the major potential impacts of pollution of the water supply, local bore depletion, noise, coal dust, reduced air quality, and reduction in property values for adjoining and affected residents, so I hereby state my support for those identifying these concerns, and the inadequacy of the Hume Coal proposal in addressing them.

In summary, Hume Coal must be rejected. It jeopardises the success of the region as a mecca for tourists; it puts at risks many more jobs in agriculture, tourism and retail than it offers; it is at odds with the Southern Highlands Development Framework which has plans for jobs in their '000s (and no mine); and, in the end, Hume Coal has no plans and no funds for a substantial deposit for remediation. The risks far outweigh any claimed benefits.

I strongly object to the Hume Coal development.

Judy Coverdale

Bundanoon resident

Judy Coverdale

B.A. (Hons), M.T.C.P. (Architecture) (Sydney Uni), AFAIM, Advanced Diploma of Fine Arts (Sydney Gallery School)