

25 June 2017

NSW Department of Planning & Environment
PO Box 39
SYDNEY NSW 2001

RE: SDD7272 Hume Coal Project—Mine and Associated Infrastructure—EIS Submission

Dear Sir/Madam,

I am making this submission to express my concerns about the Hume Coal project, in relation to the broad environmental and social impacts of the project and the inadequacy of the Hume Coal Project 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 Battle4Berrima and Coal Free Southern Highlands groups in response to the EIS and the DA for the project.

Documentation and analysis of the Hume Coal Project by Battle4Berrima and Coal Free Southern Highlands and their associates have raised a number of issues related to the proposal that cause considerable concern about the adequacy and sincerity of the EIS process for the project.

I have specifically reviewed the Statement of Heritage Impact (SHI) for the Hume Coal Project (EIS Appendix T), prepared by EMM in February 2017, drawing on my professional background in heritage management and assessment, with extensive experience in preparing and reviewing heritage documentation.

In my opinion, the SHI is a superficial assessment of the cultural heritage significance of the project area and the potential heritage impacts that would result from the proposed Hume Coal Project. The SHI identifies the various listed heritage items that would be directly affected by the proposed mine project. The main recommendations of the SHI include the preparation of Historic Heritage Management Plans (HHMPs) for each site that would be directly affected, 'to guide the conservation of heritage items and unexpected finds for the duration of the project' (E.2). These HHMPs would be prepared after approval of the project, but before specific works would be undertaken. This approach would allow little opportunity to identify mitigative measures or adapt proposed works so that any potential heritage impacts could be meaningfully reduced or avoided. The listed heritage items are also assessed individually and not within the context of a broader cultural landscape.

The SHI acknowledges the scenic character of the area, with many established rural properties and historic towns, and that the historic character of the Southern Highlands is an important aspect of the region (p. 3). However, the SHI does not adequately consider the heritage impact of the general erosion of the scenic, rural and historic character of the affected areas that would result from the introduction of

the proposed mine and associated works. The nearby village of Berrima, for example, is an outstanding example of a colonial township, with significant heritage and economic value. While the village is technically considered to be outside of the project area, it is difficult to argue that the historic character of this scenic village, which is also a major tourist destination for the region, would not in any way be affected by the introduction of a coal mine in the vicinity. There are also a number of properties and areas 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 SHI is silent on the contributory role that these places have in the broader cultural landscape. The SHI 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 SHI that should be revisited prior to any approval of the Hume Coal Project, to ensure that the cumulative heritage impacts of the project are well understood by the community, relevant consent authorities and other stakeholders.

The SHI correctly acknowledges that there are currently other industrial and mining-related activities in the general region of the proposed project area. The SHI does not, however, discuss whether any of these other enterprises have resulted in negative heritage impacts within their surrounding contexts. The argument that the proposed Hume Coal Project would represent 'more of the same' and should therefore be considered acceptable is glib and does not recognise the range of impacts that the proposal will have on properties in the region. It is disingenuous to consider that the reinstatement of grazing and other agricultural activities on land owned by Hume Coal would mitigate the various impacts of proposed project on surrounding properties and the broader community.

On this basis, I do not believe that the potential cultural heritage impacts of the proposed Hume Coal project have been adequately considered and I request that the consent authority seek further information about the nature and extent of the full range of heritage impacts that would likely result from the project.

The EIS has been exposed as essentially a marketing document that does not genuinely investigate the potential impacts of the project across the broad spectrum of environmental issues. There are so 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 drawdown of bores and pollution of waterways.
- Noise impacts to surrounding residents and villages, during construction and operation, as well as associated with transport of coal along the rail corridor.
- Impacts to air quality, including coal dust and diesel emissions.
- Removal of vegetation and natural habitat.
- Impacts on the mental health and well-being of residents and others whose land would be affected (during the construction phase and longer term).
- Negative impacts to the broader Southern Highlands economy.
- Inadequate protection from exposure to toxic reject material.
- Inadequate information about the proposed location of ventilation shafts near communities.

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