



Southern Highlands Branch

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Mr. Clay Preshaw

30 June 2017

Director of Resource Assessments

NSW Department of Planning & Environment

GPO Box 39 SYDNEY NSW 2001

Dear Mr. Preshaw,

Hume Coal Project and Berrima Rail Project – SSD 15_7172 and SSD_7171

The Southern Highlands Branch of The National Trust of Australia (NSW) makes the following submission on the Hume Coal and Berrima Rail Projects, which are both covered by a single Environmental Impact Statement.

This is a Southern Highlands Branch submission and is submitted in addition to the one you will have already received from the Trust's Mr. Graham Quint, Director – Advocacy.

The Southern Highlands Branch of the National Trust (NSW) has examined the Environmental Impact Statement (EIS) of the Hume Coal Project and considers the mine proposal in Berrima and Sutton Forest to be an inappropriate use in a highly sensitive and culturally and visually significant area, and supports the refusal of the proposal for the following 7 reasons:

1) Impact on heritage items within and surrounding the Hume Coal Project Area

- The Berrima, Sutton Forest and Moss Vale areas are recognised for their history dating back to 1819 with a number of buildings surviving from the 1820s in the vicinity of the Project Area. The risk to these buildings, as well as other 19th century buildings that dot the landscape of the area, is potentially great, unquantified and largely ignored in the EIS.
- There are many properties surrounding the mine area including several State Heritage Register (SHR) listed properties, including the National Trust's '*Golden Vale Homestead*' at 278 Golden Vale Road, Sutton Forest, which adjoins the Project Area. The Statement of Heritage Impact (SoHI) prepared by EMM largely negates any impact on these properties due to them being outside the Project Area, which is disingenuous due to the fact these properties rely on the rural setting of the surrounding area. Changes to landscape and groundwater could have serious

impacts on the significance of these matters and these potential impacts have not been assessed.

- The impact on several heritage items within the mine area is seen as negligible due to the mine being underground in those areas. However, the risk to the groundwater and the subsequent effect above ground is potentially serious and the risk of subsidence has been negated even though the so-called cutting edge mining technique is untested in the unique geology of the Southern Highlands.
- The proposed rail connection (the subject of a separate EIS) would remove a section of garden within the Boral Cement Works site in New Berrima designed by noted cold climate landscape designer and gardener, Paul Sorensen. This site has been identified by Wingecarribee Shire Council as a potential heritage item on the basis of the significance of its gardens—which also have association with local prominent garden designers and Berrima Bridge Nursery owners, Claude and Isobel Crowe—plus the rarity of gardens of such high quality on industrial sites in the area. The gardens are a prominent and significant feature of this industrial site and the loss of any remaining Sorensen garden on this site is considered to be unacceptable.
- ‘Mereworth’ is a heritage item of local significance listed in the Wingecarribee Local Environmental Plan 2010 and is the site of the mine surface infrastructure, including rail turning loop and maintenance areas.
- The proposed changes to the rural landscape of the ‘Mereworth’ property are highly intrusive and surround the house and garden area but the report states that “views to the surface infrastructure area from ‘Mereworth’ house are obscured by the surrounding garden and no noticeable visual impacts will be evident”. There is no confidence in any of the report’s conclusions if the construction of a mine with associated infrastructure, including a rail line is assessed to have “no noticeable visual impacts” on a heritage item on the same property.
- Despite the SoHI stating that there are several views to and from ‘Mereworth’ house and garden that will be impacted, the overall impact is stated as moderate. This ignores the contribution that the surrounding rural setting makes to the significance of the item and undermines the landscape design by Paul Sorensen which sought to blend the interior views of the garden with longer rural vistas. The visual impacts to and from ‘Mereworth’ house and garden have been downplayed in the EIS.
- The SoHI characterises the rural ‘Mereworth’ site as being a “highly modified landscape”. The rural landscape of the site is “highly modified” insofar as it has been ploughed for farming. This “highly modified” nature of the site is provided as justification for the development of the mine surface infrastructure on the rural land surrounding the house and garden.
- There is mention of the upkeep of the garden but little mention is made of the use and future habitation of the house. The impact of long term vacancy of ‘Mereworth’ (presumably for the 23 year life of the mine) has not been assessed in the SoHI.
- There is mention that the primary water dam (which will not be removed following the project) will blend into the landscape like a rural dam. However, its size far exceeds the size of most rural dams. The permanent impact of this on the landscape, as well as the tree buffers, has been downplayed.
- The SoHI states that there will be a slew of positive residual impacts from the proposal, namely on ‘Mereworth’ house and garden (through maintenance and

archival research) and on farming. In contrast, residual negative impacts are not considered to be high. They are limited to the removal of Aboriginal objects and possible removal of historical relics, and changes to the setting through removal of some tree lines and establishment of others. This provides an unbalanced view of the residual impacts of the proposal which could go well beyond these limited points.

- The SoHI states that a “Historic Heritage Management Plan” (HHMP) will be prepared. There is also a passing reference to a Conservation Management Plan (CMP) to be prepared for ‘Mereworth’. However, these documents are critical to understanding the true long-term impact on ‘Mereworth’. It is unclear as to whether the public will be given the opportunity to comment on the HHMP and the CMP, once prepared.

2) Impact on village of Berrima

- Berrima is arguably the most intact Georgian village in Australia and is highly valued by locals and appreciated by hundreds of thousands of visitors annually.
- The Wingecarribee Shire Council Heritage Committee has recommended that listing of the village of Berrima on the State Heritage Register (SHR) be pursued. It is believed that Berrima would meet the criteria to be listed on the SHR which indicates the importance of the town to not only the people of the Southern Highlands, but also the State of NSW.
- The core village of Berrima is covered by a heritage conservation area, as well as there being no less than 64 heritage items within the village of Berrima (16 of which are on the State Heritage Register). The village is surrounded by a landscape conservation area (both conservation areas are listed under the Wingecarribee Local Environmental Plan 2010) demonstrating the importance of the surrounding landscape to the significance of the village of Berrima. While the mine proposal lies just outside these heritage conservation areas, it will be prominently visible from both the southern approach along the Old Hume Highway and from Medway Road, which is the primary exit from the Motorway for traffic travelling from the north to Berrima. The rural road approaches to the village are critical in creating the sense of place and setting for the village.
- The EIS seems to deliberately ignore the proximity of the proposed mine—and in particular the mine surface infrastructure site—to the village of Berrima. At one point in the EIS there is a reference to a new housing subdivision in East Bowral which has no spatial or land use relationship to the project, but the village of Berrima is disregarded.
- The above ground mine surface infrastructure area is in close proximity (within 3 kilometres) of this historic village and will have a detrimental impact on the visual setting of the village.
- The potential for dust, noise and vibration impacting on the village will very likely have a negative impact on the Southern Highlands’ premier tourism destination.

3) Visual impact on rural landscapes including the National Trust’s Exeter/Sutton Forest Landscape Conservation Area

- Views from the Motorway, Old Hume Highway and Medway Road will be altered and their character changed from rural to industrial in nature. The historic rural character of the area will be permanently changed and proposed screening

around the 'Mereworth' site will permanently interrupt rural vistas that have been present for well over 150 years. It is assumed that screen plantings will not be removed at the end of the project as they are considered to be a neutral residual impact but in fact their impact on rural views is a negative impact.

- Views from surrounding properties and other surrounding minor roads were not taken into consideration in the assessment of the visual impact of the mine proposal. There are several heritage listed and historic properties whose rural open views will be disrupted by the proposed mine.
- The Berrima/Sutton Forest/Exeter area is one of the most significant and appreciated rural landscapes in the Southern Highlands. The aesthetic appeal of this area is overlaid by a rich history dating back to the early decades of the colony of NSW, making it a significant cultural landscape which has been assessed as being of State significance. This area is significant because it has not changed very much since early settlement. The SoHI report acknowledges the significance of the landscape but does not adequately assess the real impact on it, instead relying on the argument that the mine site will be remediated and returned to a former state at the end of the mine's life. However, this simplifies the reality.
- The SoHI states that there will be a significant long term (but not permanent) impact on visual amenity. However, evidence of the mine will be permanently etched into the landscape in the form of changes to views and vistas.

4) Potential impact on rural viability of land due to impacts on groundwater in the water catchment

- The risk to the groundwater in and around the mine area is unacceptable. It may have a significant impact on the rural landscape, and the viability of rural holdings in and around the mine area, including well over a dozen heritage listed properties on the fringe of the mine Project Area, due to reduction in availability of groundwater.
- The risk to water provision of the Sydney Catchment cannot be underestimated.

5) Lack of evidence to support the proposed mining method

- The proposed cutting edge mining methodology is untested and poses significant risks.
- The statement that the mining method will result in negligible risk of subsidence is undermined by the avoidance of tunnelling under the Hume Motorway and the numerous State Heritage Register listed properties which are within the mine lease area but omitted from the Project Area.
- There is also concern about the potential groundwater contamination by backfilling of mine rejects into the mine void.

6) Quality of EMM Statement of Heritage Impact

- There are numerous inaccuracies throughout the report, including the omission of the assessment of the impact on the village of Berrima and the inaccurate history with an unbalanced emphasis on the prevalence and importance of heavy industry in the region.

- The SoHI was prepared by a team solely comprised of specialist archaeologists. There appears to be a lack of expertise in built heritage conservation and cultural landscapes resulting in a report which has not adequately addressed these important heritage aspects.
- The report contains a long list of heritage items in the locality which, despite numerous omissions, demonstrates the rich history and heritage of the area in close vicinity to the mine site. This is reinforced by the heritage overlay maps that clearly show that the Berrima and Sutton Forest areas are highly significant from a heritage perspective. However, the report lacks any real assessment of the impact on the mine on these properties, particularly those outside the mine Project Area.
- The EIS makes strong and repeated claims that industry is a prominent feature of the historic landscape of the Sutton Forest and Berrima area. It states "*What is missing in previous descriptions of the landscape is the long history of heavy industry that has characterised the development of the Southern Highlands in this location.*" While there have been numerous industries, including mining, across the Southern Highlands, contrary to the picture painted in the reports these industries were rarely visually prominent and many were unsuccessful and short lived. One exception is the Berrima Cement Works which, despite a good programme of tree planting, is still a detracting visual element in the landscape. The EIS assumes this structure to be the precedent to proliferate further unsympathetic industrial infrastructure, rather than accepting it as an exception to the rule.
- The potential archaeology on the 'Mereworth' site is well documented in the SoHI but assessed to be negligible. However, no evidence of the reasoning behind this assumption is provided, beyond that the mine doesn't physically impact on the potential archaeological area.
- There seems to be a deliberate avoidance of detail about the content and timing of the historic heritage management plan and conservation management plan for the 'Mereworth' site.

7) Impact on Tourism

- The impact on tourism has been downplayed in the EIS.
- The local economy is dependent on tourism and loss of tourism due to the negative impacts by a nearby mine on one of the most picturesque landscapes in the State, will be detrimental to the local area.
- The gateway to the historic village of Berrima and the National Trust's 'Golden Vale Homestead' (which is nearing public opening) will be marred by a visually prominent mine site which will create a negative perception of the entire area.

In conclusion, the Southern Highlands Branch of the National Trust (NSW) considers that the myriad of potential risks documented in the Hume Coal Project EIS have not been adequately addressed. There is heavy emphasis on the temporary nature of the mine (23 years) which is used as a justification for the many and varied negative impacts and risks, many of which may permanently damage the landscape, economy, heritage and tourism of the Southern Highlands with minor or minimal reciprocal benefits. It is our opinion that the risks far outweigh any potential reward for the Southern Highlands and that serious consideration should be given to refusing this proposal.

Prepared in conjunction with Sarah Farnese Southern Highlands Branch Member – with responsibility for Advocacy.

Yours sincerely,

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