



Southern Highlands Branch
PO Box 2327
BOWRAL NSW 2576

24th June 2017

Major Project Assessments,
NSW Department of Planning and Environment

To Whom It May Concern,

Re: Hume Coal Project EIS

The Australian Garden History Society is a National organisation that promotes awareness and conservation of significant gardens and cultural landscapes.

It considers the landscape within which the Project Area is located to be a nationally significant cultural landscape with high landscape values and this has been acknowledged in the Environmental Impact Statement. “Elements such as early buildings such as homesteads, inns, shops and sheds combine with rolling hills, fence lines of mature pines, elms and other deciduous trees in groups, pastures and stock animals and the low level of modern development to produce a landscape that is reminiscent of the past.” (EMM Hume Coal Project EIS Appendix T *Statement of Heritage Impact*, p. 97). This landscape is a pastoral landscape that has changed little for over 100 years, with grasslands and groupings of trees along fence lines, ridges, and roads. While some of the trees are remnant native vegetation, there are also many introduced species. In this landscape buildings are generally set well back, or else screened by large hedges from the road. They blend with the landscape, and in most cases are not visible from the roads. Colours are subdued, assisting the buildings to “disappear” when viewed from public places.

The significance and uniqueness of this landscape has been recognised by the National Trust of Australia (NSW), which classified it as such in 1990. The recent landscape conservation study by Colleen Morris confirms the significance of the landscape and broadens the area. Colleen notes that parts of the area have State significance—in particular the land south of Berrima and the land in the vicinity of Oldbury and Golden Vale Roads. She recommends that the area be listed on Wingecarribee Shire Council’s Heritage Schedule and be considered for listing on the State Heritage Register. The Australian Garden History Society Southern Highlands Branch (**AGHS-SH**) is in the process of preparing a submission to Council to request the area be listed as a heritage conservation area.

Historically the landscape of the Project Area and the land within its visual catchment is devoid of any elements of heavy industrial development. Industrial development is further east and “out of sight”. (The EIS is incorrect and misleading in stating that industrial development has a long history in the significant cultural landscape area.)

In line with assessments by Professor Ken Taylor and Landscan Pty Ltd in 1992 (*Historic Cultural Landscape Assessment for Wingecarribee Shire NSW*), the National Trust and Colleen Morris, Wingecarribee Council's Planning Controls for the area recognise its value and aim to ensure that the historic rural landscape is protected. (Objectives of the relevant zones and the DCP are ignored in the EIS.)

AGHS-SH is most concerned about the impact on this landscape of a major coal mine as proposed by Hume Coal.

These concerns relate to the visual sensitivity of the area in relation to surface infrastructure and workings, and to changes in the landscape as a result of underground mining.

Mine Infrastructure

It is noted that the mine infrastructure is proposed to be located on two properties owned by Hume Coal and west of the Hume Highway (*Mereworth* and *Evandale*) on the outskirts of Berrima. Amelioration measures proposed include tree planting (already commenced), and the construction of a wall between the proposed railway line and Medway Road. However, according to the EIS these would not prevent the visual intrusion of surface infrastructure on the landscape. The wall, in fact, would potentially be quite intrusive in this landscape.

Mereworth is a heritage-listed property with a significant garden. Views out of the site were important to the garden designer (Paul Sorensen) and are important to the garden's character today. While the infrastructure has been positioned to limit its impact on these views the quality of the garden experience would still be affected visually and by noise associated with coal mining and loading activities. Every effort should be made to limit exposure from the garden and house to industrial activities such as the coal handling plant, stockpiles of material, etc.

Dust from the stockpiles to the west may also be an issue, and if the mine as proposed is approved, the approval should be conditioned to require all loose material to be covered at all times.

The large dam proposed on the *Mereworth* property, the water treatment plant and the substation near the entrance road into *Mereworth* are out of scale and character with the *Mereworth* experience. Any approval should be subject to the visual separation of these elements from the curtilage of *Mereworth* and the entry (including the new driveway, if it is used as the entrance road to the property). Views of surface infrastructure on *Evandale* from Mereworth Road should also be screened.

The temporary village would also impact on the quality of the garden experience at *Mereworth* visually and because of noise, dust, etc, associated with it. If the development is approved conditions should be imposed to ensure the amenity of *Mereworth* and its garden is retained.

Evandale, while not listed, contains some historic buildings and is an important component of the rural landscape. Mine workings would be an intrusion on this rural landscape.

Potential Impacts of Underground Mining on the Exeter Sutton Forest Cultural Landscape and Heritage items listed in Wingecarribee LEP 2010

It is proposed that the mine workings not extend beneath a number of the more significant heritage properties and the EIS notes that there will therefore be no impact on them. These include *The Harp, The Pines, Sutton Farm, Bunya Hill, Comfort Hill, Newbury* and *Eling Forest Winery*. A further ten adjoin the workings and could be impacted upon because of mining operations, but potential impacts on these properties have not been addressed in the EIS.

The EIS states that there would be no impact on significant heritage properties during or after mining operations. The **AGHS-SH** is concerned that structures, paving and drainage could be affected should the mining operations cause movement at the earth's surface. As the area is not a declared Mine Subsidence District there is no mechanism for determining if structural damage is due to mining operations, nor to rectify damage should it occur. **AGHS-SH** therefore requests that the area be declared a Mine Subsidence District under the *Mine Subsidence Act*, which would enable mechanisms to measure impact to apply and which would provide funds for rectification should there be movement due to mine subsidence.

The vegetation of the Sutton Forest - Exeter Landscape Area relies on groundwater to survive during periods of low rainfall. The EIS notes that much of that area would suffer from water table draw down, putting the significant trees and other vegetation integral to the character of the area at risk. There is also the potential for greater damage to structures if the soils of the area dry out, and there is not a water supply source available to prevent this. A total of 23 heritage-listed properties would be affected by water table drawdown and/or underground workings.

The risk from the proposed mining method to the ground water table and to the landscape of the Sutton Forest - Exeter landscape is therefore unacceptable.

Yours sincerely,

Jennifer Carroll
Chair,
Australian Garden History Society – Southern Highlands Branch