15 July 2022

NSW Independent Planning Commission

Mt Pleasant Optimisation Project - Issues surrounding Visual Impact Assessment & Conclusions

I would like to take the opportunity to raise concerns surrounding the Visual Impact of the proposal and in particular the methodologies applied in the assessment of the impacts which, I believe understate the long term visual impacts of the proposal. I can confirm that I have read the Expert Witness Code of Conduct contained in Schedule 7 of the UCPR, and I agree to be bound by it.

I am a Landscape Architect with 25 year's experience in the preparation of Landscape and Visual Impact Assessment. A significant part of my practices work is undertaking the assessment of landscape character and associated cultural values and the potential impacts upon these attributes and broader visual amenity in the context of large scale infrastructure development. I regularly provide expert witness services to the NSW Land and Environment Court and the Victorian Civil and Administrative Tribunal on issues pertaining to visual character, amenity and impact. As part of a Australian Institute of Landscape Architects (AILA) working group I have recently been assisting the NSW DoP in drafting guidelines for the assessment of large scale renewable energy projects in NSW.

I am a resident of Newcastle and Craven (near Gloucester) and a frequent visitor to the coal mining areas of the Hunter Valley. Over the past 10 years I have noticed the increasing visual presence and dominance of mining operations in the Hunter Valley, particularly in the areas surrounding Muswellbrook and Singleton and most noticeably when viewed from the main transport corridors of the New England Highway and the Golden Highway. Over this period I have noted a continuing degradation of the landscape character of the region as a result of the mining operations, the engineered and unnatural approach to the placement of overburden and the consistent failure of remediation projects which appear to rarely, if ever, deliver on the promises of reinstatement of the diverse woodlands and grasslands habitats lost. The reality is generally featureless and homogenous landscapes that are susceptible to drought as the the landscape has lost the important stratification and structure of topsoils, subsoils, rock, sand and clay that retained the vital moisture that sustained the landscape through extended periods without rain.

It is proposed that these complex geologies, that have shaped the landscape and driven the evolution of the species and ecological communities that occupy the slopes and plains of the Hunter Valley, be replaced by compacted rock overburden which is arbitrarily ripped along contour lines and topped with 100mm of ameliorated top soil.

Through my experience as a Landscape Architect who has worked for the past 23 years on landscape projects within the Hunter Valley including the areas surrounding Scone, Muswellbrook and Singleton I am acutely aware of the challenges in establishing vegetation on degraded and modified landscapes and the challenges that exist even with ample available resources of viable top soil, irrigation and labour. The Hunter Valley experiences cold, windy and sometimes wet winters and hot summers with often long periods without precipitation. Recently the

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effects of climate change are becoming more and more pronounced with the long period of drought and subsequent bushfires leading up to the 2019/2020 Black Summer catastrophe and the ongoing intense rain periods and associated flooding events that have occurred since with increasing frequency. In ideal conditions it would be a significant challenge to undertake the rehabilitation of this landscape with the current proposed approach. In the context of the current and changing climate of the Hunter Valley where more extreme events are becoming a more common occurrence, it is my opinion that there is significant risk of continual failure of these rehabilitation projects.

I highlight this issue as the Visual and Landscape Impact Assessment of the Mt Pleasant Optimisation Project concludes that during operation impacts associated with the central sector are consistently high (refer Table 7.1 Summary of the Visual Impacts of the Project p.96 *Mt Pleasant Optimisation Project - Visual and Landscape Assessment 2020– VPA Visual Planning and Assessment 2020* [VPA VLA]) and in most cases above the determined impacts of the existing approval. This is particularly the case for the residents in North Muswellbrook and South Aberdeen and for landholders and views from the public domain in between. For these residences the impact will remain high for decades during the project phase. The impact will change these views from residences (and views from public roads) in perpetuity and will impact on the horizon line with the finished level of the waste rock emplacement well exceeding the height of the existing landform.

The subsequent conclusions of “low” long term impacts of the proposal are based on the successful revegetation of the waste rock emplacements. For the reasons stated above, it is my strong opinion that the positive effect of the rehabilitation is significantly overstated.

It is my opinion that there is considerable risk that the rehabilitation and mitigation strategies proposed would not ameliorate the visual impacts of the Project sufficiently long term. It is also my opinion that complete remediation of the site to mimic or resemble the appearance of the site prior to mining would not be possible. The proposed build up of material will change the existing eroded character of the ridges gullies, the additional height of the range will also appear unnatural as it is not in keeping with the eroded land. Due to the change in subsoil and topsoil depths and the compacted nature of the substrate and changes to site hydrology, how vegetation species and communities establish will be different. With limited soil depth tree growth is likely to be more stunted, and, although the same communities of species may be planted, different species will dominate due to the changed conditions. Also, as final proposed planting is occurring within a relative narrow time frame the vegetation will lack the diversity in age and size that natural woodlands possess. Once complete remediation of the final landform has been achieved (assuming this can be achieved) the landscape will not mimic the existing landscape as the modified soil conditions, shallow subsoils, changes in site hydrology and broad scale methods of planting proposed will not result in vegetation patterns or communities that are consistent with the adjoining land that has not been disturbed by mining. The disturbed landscape will always appear different to its surroundings.

Considering the extent of “High” visual impact identified in the VPA VLA I am surprised at the lack of consideration given to the visual impact experienced by residents with views towards the proposal or the impact on the broader landscape character in the NSW DoP State Significant Development Assessment Report particularly as the impacts have been determined to be generally greater than the extent of impacts identified with the approved proposal.

It is important to note that the proposal does not provide any time frame or performance specification on the remediation and rehabilitation of the landscape only that it will occur post completion of operations. The recommended conditions in the report request that MACH *“rehabilitate the integrated waste rock emplacement as*

soon as practical". Through my experience in working on large scale renewable projects I find it remarkable that the Department has not been as insistent on providing assurance to the surrounding community on the time frames, extent of impact and potential risks to their amenity that they will experience and over what time frame.

The Mt Pleasant optimisation project is one of several large scale coal mining operations in the region that are having an increasingly degrading influence on the landscape character of the Hunter Valley. It is my opinion that the long term plans for rehabilitation of the mining sites are consistently optimistic and at genuine risk of partial or total failure for the reasons stated above. The burden of these failures will be carried by future generations residing in the Hunter Valley who will not experience the economic benefits of the mining operations but will be surrounded by a highly modified landscape that is limited in its diversity, appeal and function.

It is my hope that the IPC will recognise the risks associated with the proposed rehabilitation approach and give careful consideration to the visual impacts of the proposal and, that any conditions for approval, would hold the proponent to the highest standard in regards to methodologies and approach to the rehabilitation of soils, vegetation communities and the sustainability and contributions to the regions character of the broader visual landscape.

Kind regards

[redacted]

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