



a mining and metals company

Appin Mine Heritage Management Plan

Name	Position
Document Owner	Superintendent Environment
Document Approver	Superintendent Environment

People involved in the review of this plan

Name	Position	Company/Site	Exp (yrs)	Revision
Chris Schultz	Superintendent Environment	ICHPL	28	May 2025
Cody Brady	Principal Approvals	ICHPL	8	May 2025
Pollyanna Barlow	Specialist Environment	ICHPL	4	April 2024
Renée Regal	Heritage Consultant	Regal Heritage	19	June 2024
Antony Leone	Manager External Affairs	ICHPL		May 2024

Document Revisions

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1.0	Change to numbering to reflect the document relates to Appin Mine (previously ICHMP15129). Updated to include feedback from consultation and comments from the Department.	November 2021
2.0	General update. Inclusion of AMVA Project. Inclusion of updated CMP for the Mountbatten Group. Inclusion of updated consultation and responses.	May 2025

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1 Introduction

1.1 Project Background

Appin Mine incorporates the underground mining operations, which extract coal from the Bulli Seam, and associated surface activities, including the West Cliff Coal Preparation Plant (WCCPP) and Coal Wash Emplacement Area (CWEA). Appin Mine is located approximately 25 kilometres (km) north-west of Wollongong in New South Wales (see Plan 1). Appin Mine is owned and operated by Endeavour Coal Pty Ltd, a subsidiary of Illawarra Coal Holdings Pty Ltd (ICHPL), which is a wholly owned subsidiary of Gear M Illawarra Met Coal Pty Ltd.

Appin Mine, Cordeaux Colliery and Dendrobium Mine (and associated facilities) are collectively operated by GM³.

ICHPL received Project Approval 08_0150¹ (the Project Approval) from the Planning Assessment Commission of NSW under delegation of the Minister for Planning and Infrastructure on 22 December 2011 for current and proposed mining of the Bulli Seam Operations (BSO) for the next 30 years, and production of up to 10.5 million tonnes per annum of run of mine (RoM) coal. This approval incorporates underground mining, transport and coal wash emplacement activities undertaken 24 hours a day, seven days per week.

This Heritage Management Plan (HMP) outlines programs and procedures for the management of Aboriginal and non-Aboriginal heritage in the BSO Project study area including the preparation of subsequent management plans required for Extraction Plans and surface works. The BSO Project study area is located in the vicinity of the townships of Appin, Wilton, Douglas Park, Picton and Menangle.

1.2 Objectives

The objectives of this HMP are to:

- outline statutory requirements for Aboriginal and non-Aboriginal Heritage, including any Project Approval performance measures to be achieved;
- provide an overview of Aboriginal and non-Aboriginal heritage sites within the BSO Project study area;
- detail the procedures for ongoing consultation with Registered Aboriginal Parties (RAPs) and other community stakeholders, including the provision of access to archaeological sites to the Aboriginal community;
- detail the procedures for the preparation and integration of HMPs to be undertaken as part of Extraction Plans;
- detail the procedures for the preparation and integration of Conservation Management Plans (CMPs) to be undertaken for heritage items of State or National Heritage Significance;
- detail the procedures for publishing, lodgment and provision of public access of CMPs;
- detail the procedures for archaeological excavation, archival recording, conservation and subsidence monitoring programs;

¹ As modified.

- detail management options and procedures for any heritage sites that may be affected due to mining subsidence;
- present contingency plans for the unexpected discovery of Aboriginal objects, sites and human remains; and,
- present contingency plans for the unexpected discovery of historical relics and sites.

1.3 Purpose and Scope

The purpose of this HMP is to identify Aboriginal and non-Aboriginal heritage sites and/or places in the BSO Project study area (refer to Plan 2) and to detail the management procedures and requirements to manage these items in accordance with the conditions and performance measures of the Project Approval.

Preparation of this HMP has been undertaken in accordance with the Condition 24 of Schedule 4 of the Project Approval which requires that the proponent shall prepare and implement a HMP that covers both Aboriginal and non-Aboriginal heritage. The overall Heritage Management Strategy and the role of this HMP in the management of heritage in the BSO Project study area are discussed in Section 5.

This Appin Mine HMP is the overarching plan for managing heritage impacts associated with Appin Mine operations and informs the relevant Extraction Plan HMP, the Surface Activities Management Plan and Gas Drainage Management Plan. Management and mitigation strategies for heritage sites in the CWEA are provided in the CWEA Management Plan. The processes as outlined in the HMP will be utilised if any new sites are identified in the CWEA footprint.

An Aboriginal Cultural Heritage Management Plan was developed for the Appin Mine Ventilation and Access (AMVA) Project.

The scope of the HMP applies to all existing and future activities related to Appin Mine at:

- Appin East, Appin West and Appin North Pit Top areas;
- existing Ventilation Shafts 1 (downcast), 2 (upcast), 3 (downcast) and 6 (upcast);
- AMVA Project site (including Ventilation Shafts 7 (downcast) and 8 (upcast));²
- Douglas North Substation;
- WCCPP; and
- CWEA.

1.4 Environmental Management System

ICHPL has a comprehensive Environmental Management System (EMS) in place to minimise the impact of its operations on the local environment and community. The HMP is a component of the EMS which is certified to ISO 14001.

1.5 Consultation Process

In accordance with Condition 24 (a) of Schedule 4 of the Project Approval, Revision 2.0 of the HMP was prepared in consultation with Heritage NSW, RAPs, Wollondilly Shire

² Construction at the Ventilation Shaft 7/8 site commenced in FY22 and is expected to be completed in FY26.

Council, Campbelltown City Council and historical organisations (including the National Trust, Campbelltown and Airds Historical Society Inc, the Illawarra Historical Society, Appin Historical Society and The Oaks Historical Society). Consultation was also undertaken with the Appin Mine Community Consultative Committee. A log of consultation undertaken and the outcomes of this consultation for the preparation of Revisions 1.0 and 2.0 of the HMP is provided in Appendix 3.

A list of RAPs was requested from the Native Title Services Corporation, Office of the Registrar Aboriginal Land Rights Act 1983, Heritage NSW, Wollondilly Shire Council and National Native Title Tribunal in June 2021. The RAPs as listed in Appendix 4 were contacted for comment on the HMP. No specific comments or concerns regarding the HMP were received from the RAPs.

Consultation with stakeholders as stated in Condition 24 (a) of Schedule 4 of the Project Approval will only be undertaken where there is a material change to heritage management or if specifically requested by the Department. Administrative or descriptive changes do not constitute a material change.

Consultation with landowners is also required and this is undertaken during the development of Extraction Plans when relevant landowners above the longwall panels are identified.

Consultation was undertaken with the following RAPs on 21 March 2024 on the planned management measures for Aboriginal heritage sites in or adjacent to the approved Stage 3 and Stage 4 CWEA footprints as listed below:

- Cubbitch Barta.
- Tharawal Local Aboriginal Land Council.
- Guntawang Aboriginal Resources Incorporated.
- Woronora Plateau Gundungara Elders Council.
- South Coast People Native Title Claimant.
- Kamilaroi Yankuntjatjara Working Group.

Details of this consultation are provided in the CWEA Management Plan.

Stakeholders will be provided with a minimum of ten (10) business days to provide feedback. Extensions may be provided on request and comments received outside of this period will be reviewed. This may require a review of the approved HMP if considered to be material to heritage management, otherwise they will be recorded and incorporated into the next review.

2 Roles and Responsibilities

Roles and responsibilities associated with environmental management at Appin Mine are defined in the Environmental Management Strategy. Table 1 outlines the roles and responsibilities associated with the implementation and periodic review of the HMP.

Table 1: Roles and Responsibilities

Role	Responsibilities
Specialist Environment	Meet the commitments contained within the HMP for the operational areas. Review and issue Permits to Disturb.
Superintendent Environment	Liaise with external stakeholders with regard to the HMP. Review of the HMP.
Principal Approvals	Liaise with regulators with regard to the HMP. Meet the commitments contained within the HMP for the mining areas.
Corporate Affairs Team	Meeting the commitments contained within the HMP for stakeholder engagement.
General Manager Sustainability and Approvals General Manager Appin Mine	Provide the necessary resources and systems to ensure that requirements of the HMP are met.

Cultural Heritage Awareness Training will be provided to nominated personnel as part of inductions or through targeted sessions aimed at minimising the potential for accidental damage to Aboriginal cultural heritage.

3 Legislation and Planning

3.1 Project Approval Conditions

Potential heritage impacts associated with Appin Mine were identified during the preparation of the BSO Project Environmental Assessment (EA) 2009 and the Modification Report for the AMVA Project (MOD 3). The EA and Modification Report were assessed and approved under the *Environmental Planning and Assessment Act 1979 (EP&A Act)* and associated Regulations.

All activities carried out at Appin Mine will be generally in accordance with the Project Approval (as modified), in accordance with any written directions of the Planning Secretary and generally in accordance with the Environmental Assessment (EA), Statement of Commitments and Preferred Project Report.

Appendix 1 outlines the heritage management requirements of the Project Approval and cross references where the requirements have been addressed within the HMP.

Documents as listed in Condition 11 of Schedule 6 will be made available on the GM³ website at [link](#).

In accordance with Condition 4 of Schedule 2, ICHPL will comply with any reasonable and feasible requirements of the Secretary arising from the Department's assessment of:

- a) any strategy, study, system, plan, program, review, audit, notification, report, or correspondence submitted under or otherwise made in relation to this approval, including those that are required to be, and have been, approved by the Planning Secretary; and
- b) the implementation of any actions or measures contained in any such document referred to in condition 4(a).

3.2 Environment Protection Licence Requirements

Environment Protection Licence (EPL) 2504 applies to Appin Mine and associated activities. A copy of the licence can be accessed on the Environment Protection Authority (EPA) website: [here](#).

3.3 Relevant Legislation

Key regulatory and HMP obligations applicable to Appin Mine are managed via an online obligations management database. The obligations are allocated to responsible personnel. This process is detailed in the Environmental Compliance/Conformance Assessment and Reporting Procedure.

Legislation applicable to heritage management may include but is not limited to:

- *EP&A Act;*
- *Environment Protection and Biodiversity Conservation Act 1999;*
- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984;*
- *National Parks & Wildlife Act 1974 (NPW Act);*
- *National Parks and Wildlife Regulation 2019;*
- *NSW Heritage Act 1977;* and
- *Public Health Act 2010.*

3.4 Guidelines and Standards

This HMP has been developed to be consistent with the principles of the following:

- ISO 14001:2015 Environmental Management Systems;
- GM³ Sustainability Policy.

Other relevant guidelines for heritage management include:

- The Burra Charter: the Australia ICOMOS (International Council on Monuments and Sites) Charter for Places of Cultural Significance (2013);
- Guidelines for assessing places and objects against the Heritage Council of NSW criteria, Environment and Heritage Group (2023);
- NSW Minerals Industry Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales. (NSW Minerals Council 2010);
- Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW);
- Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010);
- Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH 2011); and
- The Conservation Plan, James Semple Kerr (7th edition).

4 Heritage Assessment

A summary of assessments for Aboriginal and non-Aboriginal heritage items undertaken for the EA and Modification Report (MOD 3) are provided below. A full list of Aboriginal and non-

Aboriginal heritage items is provided in Appendix 5 and Appendix 6 respectively³. Aboriginal heritage sites within the BSO Project footprint are shown on Plan 3⁴. Non-Aboriginal heritage items are mapped in other plans as required and specific to the activity covered by the plan to avoid inadvertent impacts.

4.1 BSO Project EA and subsequent surveys

4.1.1 Aboriginal Heritage

An assessment for Aboriginal heritage sites within the BSO Project study area was undertaken by Biosis Research for the 2009 BSO Aboriginal Cultural Heritage Assessment (ACHA). A total of 99 Aboriginal heritage sites have been recorded in the BSO Project area, with 32 new sites being recorded on the Aboriginal Heritage Management System (AHIMS) during the 2009 ACHA works.

One (1) new site was recorded during the supplementary surveys for Appin Area 9 (Biosis Research 2012) and one new site recorded during the supplementary surveys for Appin Areas 7 and 9 (Biosis Research 2021). During the ACHA works for MOD 3 it was noted that one of the Aboriginal heritage sites identified as part of Biosis Research 2021 was a duplicate recording on AHIMS. This takes the total number of Aboriginal heritage sites within the current mine lease to 100. There are no Aboriginal Places gazetted within the current mine lease. A complete list of Aboriginal heritage sites in the BSO Project study area is provided in Appendix 5.

Aboriginal heritage items recorded included 34 Potential Archaeological Deposits (PADs), 29 shelter with art sites, 24 axe grinding groove sites, six open camp sites/isolated stone artefact finds, four (4) shelters with deposits and two (2) culturally modified trees. Of the 65 previously recorded Aboriginal heritage sites, 17 were inspected or attempted to be inspected during the survey effort for the 2009 ACHA. The 2009 ACHA survey effort attempted to relocate Aboriginal sites of moderate and high archaeological significance. A number of these sites were not able to be relocated, particularly sites for which verified GPS co-ordinates were unavailable.

Niche Environment and Heritage Pty Ltd (Niche) undertook an Aboriginal Cultural Heritage Assessment (ACHA) for the Stage 4 CWEA in September 2023, including a pedestrian archaeological and cultural heritage survey with Aboriginal parties.

During the course of the survey, all previously recorded AHIMS sites were located. Aboriginal cultural sites West Cliff 3 (AHIMS ID#52-2-3506) and Dendrobium 11 (AHIMS ID#52-2-3616, a duplicate of site 52-2-3533) were ground-truthed using the AHIMS provided locations. The AHIMS location of Aboriginal cultural heritage site Dendrobium 11 (AHIMS ID#52-2-3533) was determined to be a duplicate of AHIMS ID#52-2-3616. Both AHIMS locations were surveyed and it was determined the location listed for AHIMS ID#52-2-3616 is correct. The AHIMS location of Aboriginal cultural heritage site West Cliff 5 (AHIMS ID#52-2-3508) was identified however no artefacts were observed at the location. No additional Aboriginal cultural heritage sites were identified during the survey.

It is expected that more detailed surveys will be undertaken in consultation with the RAPs as part of HMPs prepared for Extraction Plans or significant surface projects. This may include attempting to locate sites previously unable to be located, depending on the type of site, potential for impacts and location in the landscape. Where appropriate and

³ Coordinates for Aboriginal heritage sites have been redacted in publicly available versions of the HMP.

⁴ This plan has been redacted in publicly available versions of the HMP.

practical, avoidance and mitigation measures will be implemented for sites unable to be located that may be impacted.

Procedures and protocols for further Aboriginal heritage assessments are detailed in Section 7.

4.1.2 Non-Aboriginal Heritage

An assessment for non-Aboriginal heritage within the BSO Project study area was undertaken by Michael Pearson Heritage Management Consultants Pty Ltd (MPHMC) for the 2009 Bulli Seam Operations non-Aboriginal Heritage Assessment (NAHA). The NAHA identified 49 heritage items in the BSO Project study area and includes items of local and state significance. No new heritage items were identified during supplementary surveys for Appin Area 9 (Biosis Research 2012). A complete list of non-Aboriginal heritage sites in the BSO Project Area is provided in Appendix 6.

4.2 Modification Report – AMVA Project

4.2.1 Aboriginal Heritage

The Aboriginal Cultural Heritage Assessment Report Appin Mine Ventilation and Access Project Menangle, NSW was prepared by Niche Environment and Heritage (2021, Appendix F of the modification application).

Consultation was undertaken with twenty-one (21) Aboriginal stakeholders (including groups and individuals) who identified themselves as Registered Aboriginal Parties (RAPs) through the consultation process following the Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW).

The Subject Area has been previously investigated within the wider Bulli Seam Operations Cultural Heritage Assessment (Biosis Research 2009). The survey undertaken for that assessment identified one isolated artefact site within the Subject Area; Bulli Site 7 (AHIMS ID#52-2-3687, Biosis Research 2009: 94). The assessment also identified areas of PAD within the Menangle region that are likely to contain subsurface archaeological deposits. It was concluded that PADs within the Menangle area are generally located adjacent to watercourses in depositional soil landscapes (Biosis Research 2009: 29). The predictive model developed in the BSO Assessment indicates that the eastern edge of the Subject Area along Foot Onslow Creek, has the potential to contain subsurface Aboriginal objects.

An archaeological test excavation of the Subject Area identified that Bulli Site 7 (AHIMS ID#52-2-3687) is a low-density open camp site that extends to the south of the originally recorded location and across to the eastern bank of Foot Onslow Creek. Part of Bulli Site 7 (AHIMS ID#52-2-3687) falls within the proposed Ventilation Shaft footprint and will be directly impacted because of the works program. The site is assessed to hold low scientific (archaeological) significance. Through the consultation process the RAPs advised that all sites have cultural significance.

The process for management of this site and any unexpected finds was detailed in the Aboriginal Heritage Management Plan for the AMVA Project site dated 18 May 2022. The process for managing this site is summarised in Appendix 7. There were no unexpected finds during the construction process.

4.2.2 Non-Aboriginal Heritage

The Historical Heritage Assessment Appin Mine Ventilation and Access Project was prepared by Niche Environment and Heritage (2021, Appendix G of the modification application). In conclusion it stated:

- An analysis of historical resources has found that the Subject Area has remained largely unchanged from first European settlement and farming of the area. Little to no development has occurred within the Subject Area associated with the identified historical phases.
- The Subject Area has been assessed to contain no heritage items and have a very low to low potential to contain archaeological resources associated with the identified historical phases.

5 Heritage Management Strategy

An overview of the Heritage Management Strategy for Appin Mine is shown in Figure 1. This strategy shows the relationship between this HMP and future HMPs and CMPs prepared for future Extraction Plans and surface works management plans as required by the Project Approval.

This HMP details the procedures for communication with stakeholders, evaluation of compliance with performance conditions, the preparation of future HMPs and CMPs and contingency plans for the discovery of unanticipated heritage items.

Specific impact assessments and management recommendations for heritage items are to be provided in future HMPs developed to support Extraction Plans and surface works management plans when details regarding potential impacts will be able to be provided.

Future HMPs will comply with the procedures laid out in this HMP, unless specific management requirements for heritage items require otherwise.

CMPs will be prepared or updated for State and Nationally significant heritage items as required (see Section 8). The CMP recommendations will be incorporated into HMP programs where applicable.

6 Communication Procedures

ICHPL has community consultation and communication procedures for Appin Mine that are guided by the Stakeholder Engagement Management Plan. The communication procedures detailed in this section are specifically required for the management of Aboriginal and non-Aboriginal heritage and preparation of management plans in accordance with the Project Approval consultation requirements (see Section 1.5). These procedures are undertaken in conjunction with the wider community consultation and communication procedures as required.

6.1 Ongoing Consultation with Stakeholders

Ongoing consultation with stakeholders for Aboriginal and Non-Aboriginal heritage is a requirement of the Project Approval and the procedures detailed below are provided to enable effective consultation with appropriate stakeholders during the life of the project.

6.2 Review of Stakeholders

A current list of stakeholders for Aboriginal and non-Aboriginal heritage, including regulatory, local government, Aboriginal and local historical bodies, and the feedback from consultation, is provided in Appendix 3. The Project Approval permits mining operations to continue until 31 December 2041 and it is expected that stakeholders for

Aboriginal and Non-Aboriginal heritage will change during this period. The stakeholder list will be reviewed⁵ and revised for each future HMP to maintain a current record of stakeholders. ICHPL is committed to maintaining ongoing consultation with Aboriginal stakeholders throughout the life of the Project. Aboriginal stakeholders are encouraged to provide up-to-date contact details (full name, postal address, telephone number, and where possible, email address) to ICHPL when details change.

The actions of the review should include the following:

- a notification to all current stakeholders of the intent to undertake the review;
- enquiries made to the following services to identify new stakeholders that should be contacted:
 - i. the Registrar, *Aboriginal Land Rights Act 1983* for an updated list of Aboriginal owners relevant to the study area;
 - ii. the National Native Title Tribunal for a list of registered native title claimants, native title holders and registered Indigenous Land Use Agreements;
 - iii. Native Title Services Corporation Limited; and
 - iv. Heritage NSW.
- enquiries made to Heritage NSW to identify and update Aboriginal organisations with interests in the study area;
- any new organisations identified through enquiries are to be contacted and given a 14-day period to register their interest in being consulted; and
- a review of current RAPs and historical organisations should be undertaken to identify and remove either unresponsive or inactive parties, include new organisations that have been identified and indicated that they wish to be involved in consultation and update contact details for all stakeholders on the list.

6.3 Consultation with Stakeholders during review of HMP

In accordance with Condition 24 of Schedule 4 of the Project Approval, reviews of this HMP (as detailed in Section 11.3) shall be undertaken in consultation with Heritage NSW, the Aboriginal community, Council any local historical organisations and relevant landowners. The consultation process for this review of the HMP is described in Section 1.5.

6.4 Consultation with Stakeholders during preparation of future HMPs

Consultation with the current list of stakeholders during the preparation of future Extraction Plan HMPs for Appin Mine should include the following actions:

- a formal notification to stakeholders of the intent of ICHPL to prepare a new HMP, including a brief outline of the expected timings and requirements of consultation;
- invitation and participation of RAPs in any supplementary field surveys for Aboriginal heritage in order to collect information in regard to the cultural heritage values of any Aboriginal sites relocated or identified (if required);

⁵ A review is not required if the review has been undertaken within the last six months for an Appin Mine project, HMP or Extraction Plan.

- opportunity to be provided to review draft HMPs and provide input to recommendations and management actions for heritage items; and
- provision of a copy of final HMPs on the GM³ website.

The process for future HMPs is outlined in Section 7.

6.5 Informing Stakeholders of Unexpected Heritage Finds

Relevant stakeholders will be provided with updated site card or data forms of any new or updated heritage sites for their records following the completion of studies.

6.6 Consultation with Stakeholders during Monitoring Programs

Consultation with stakeholders during subsidence monitoring programs will include the following actions:

- the provision of Archival/Baseline Reports, Monitoring Reports and written notification at the beginning and end of each monitoring activity; and
- if impacts to Aboriginal or non-Aboriginal heritage sites do occur, stakeholders will be involved in the inspection of sites, heritage values risk assessments and the development of further management actions as detailed in Section 7. Continued involvement of relevant RAPs in management actions and decisions for Aboriginal heritage is critical for achieving best practice management outcomes.

6.7 Managing Aboriginal Community Access to Aboriginal Sites

Aboriginal people and/or groups wishing to access Aboriginal heritage sites should contact ICHPL on 1800 102 210 or email community@gm3.au with a request to access specific sites and ICHPL will facilitate access to the site/s if possible. Access to sites may not be able to be facilitated if:

- individual landowners choose to prohibit access; or
- compliance with occupational health and safety requirements for specific areas is unable to be achieved.

7 Preparation of Future Heritage Management Plans

Future HMPs will be required to be prepared to support future Extraction Plans and surface works management plans.

The preparation of Extraction Plans is required for the first and second workings of each longwall mining domain in accordance with Condition 5 of Schedule 3 of the Project Approval. Condition 5 (k) details the HMP requirements for each Extraction Plan as shown in Appendix 1.

As detailed in Schedule 4 of the Project Approval (see Appendix 1), heritage assessments are also required for the CWEA Management Plan, Gas Drainage Management Plan and Surface Activities Management Plan.

Each HMP must also be prepared in accordance with the general management plan requirements detailed in Condition 2 of Schedule 6. HMPs will be made available on the GM³ website, in accordance with Condition 11 of Schedule 6 of the Project Approval.

Each HMP must adequately assess and address potential impacts from project activities to heritage that may occur outside of the project area. Where subsidence will occur as a result of project activities, the HMP study area must extend to 600 metres beyond the extent of longwall

mining and include any features sensitive to far field movements to adequately assess the potential impacts from subsidence effects.

The procedures outlined below will be undertaken for the preparation of HMPs. These procedures take into account the Project Approval conditions outlined above and the recommendations of the ACHA (Biosis Research 2009) and the NAHA (MPHMC 2009).

7.1 Review and Update of Heritage Register Searches

Searches will be undertaken of the following heritage listings and databases for known heritage sites and studies:

- National Heritage List;
- Commonwealth Heritage List;
- Register of the National Estate;
- National Native Title Register;
- Register of Native Title Claims;
- Register of Aboriginal Land Use Agreements;
- Aboriginal Heritage Information Management System (AHIMS);
- NSW Aboriginal Heritage Impact Permit (AHIP) boundaries seed layer;
- State Heritage Register (SHR); and
- Relevant Council Local Environmental Plans (LEPs).

7.2 Additional Heritage Investigations

Additional background research for Aboriginal and non-Aboriginal heritage will be undertaken to address any knowledge gaps identified in the investigations undertaken for the EA.

If required, supplementary surveys will be undertaken for each HMP to identify new and relocate previously recorded Aboriginal and historic heritage sites within each HMP study area.

Invitations to attend scheduled fieldwork will be provided in writing with ten (10) business days' notice and no less than five (5) business days' notice where unscheduled inspections are required. Where there are matters that require rapid assessment and participation, with agreement from RAPs, the five (5) days' notice may be less.

Supplementary surveys for Aboriginal heritage, where appropriate, will be undertaken in accordance with the archaeological survey, data collection and reporting requirements specified in the *NSW Minerals Industry Due Diligence Code of Practice for the Protection of Aboriginal Objects* and/or *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010). All Aboriginal sites will be recorded in accordance with the requirements of the NPW Act and the Heritage NSW guidelines and new/updated AHIMS site cards provided to the AHIMS registrar.

Supplementary surveys for non-Aboriginal heritage will be undertaken in accordance with Heritage NSW guidelines. All non-Aboriginal sites will be recorded in accordance with Heritage NSW guidelines and relevant site information provided to relevant Councils or Heritage NSW for consideration of listing on either LEPs or the SHR as relevant for each site.

State and nationally significant heritage items, and other items as required, will need the preparation or updating of a CMP (see Section 8). The CMP will inform the HMP and any recommendations should be incorporated into HMP management programs.

7.3 Review and Update of Heritage Register Searches

Updated significance assessments must be provided for Aboriginal and non-Aboriginal heritage items within the relevant study area.

Significance assessments for Aboriginal heritage must include a cultural heritage values assessment and be undertaken in accordance with the following relevant guidelines:

- Burra Charter;
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010); and
- Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH 2011).

Significance assessments for non-Aboriginal heritage must be undertaken in accordance with the following relevant guidelines:

- Burra Charter;
- NSW Heritage Manual; and
- Assessing Heritage Significance - Guidelines for assessing places and objects against the Heritage Council of NSW criteria .

Assessment of significance for Aboriginal and non-Aboriginal heritage sites should be undertaken using a landscape approach where possible and referencing themes identified in the New South Wales Historical Themes (NSW Heritage Council 2001) or local heritage studies.

7.4 Impact Assessments

Each HMP will provide a revised impact assessment for Aboriginal and non-Aboriginal heritage items within the relevant study area.

Impact assessments must consider all relevant potential impact activities including subsidence risk assessments provided by specialists.

Structural assessment of non-Aboriginal heritage items by a qualified Structural Engineer, Conservation Architect and other specialists may be required to adequately assess the risk of subsidence effects to built heritage items.

7.5 Heritage Management Programs

Each HMP will detail management programs for Aboriginal and non-Aboriginal heritage within the relevant study area, including any Aboriginal or non-Aboriginal heritage items that may be outside of the project area but may still be subject to project related impacts, and include the following:

- consideration of avoidance or minimisation of harm strategies, which may include but not be limited to:
 - i. Avoidance of harm through sympathetic project design and/or management of project works. Avoidance of harm strategies should be

explored in preference to minimisation or management of harm strategies.

- ii. Minimisation of harm strategies through sympathetic project design and/or management of project works. Minimisation of harm strategies should be explored in preference to pre-mining engineering measures.
 - iii. Consideration of pre-mining engineering measures (such as stress relief slots or wall bracing) for heritage items with the potential to be affected by subsidence. Considerations must include the level of risk of harm to the site, stakeholder (RAPs for Aboriginal heritage) endorsement of any engineering measures, the impact that engineering measure may have on the site, landholder approval for the measure and in consultation with Heritage NSW.
- excavation or archival recording requirements for any Aboriginal or Non-Aboriginal heritage sites associated with areas that will be directly harmed by any works. Excavation or archival works must consider the procedures detailed in Section 7.6.4;
 - requirements for subsidence monitoring of any Aboriginal and non-Aboriginal sites, which must consider the procedures detailed in Section 7.6; and
 - a protocol for the management and reporting of any Aboriginal or non-Aboriginal heritage sites that may be identified during the life of the Project in compliance with the unanticipated finds procedures outlined in Section 9.

7.6 Subsidence Monitoring Requirements

7.6.1 Baseline Recording of Heritage Sites

Detailed baseline recording of heritage sites will be undertaken prior to the extraction of any proposed longwalls. The purpose of the detailed baseline recording is to:

- mitigate the risk of potential impact through more detailed archival recording; and
- provide a set of baseline records for the monitoring program.

The recording and monitoring regime described in this report aims to implement a monitoring program, and to establish recording procedures that are consistent with current technologies and practice and capture a record of the heritage sites in their pre-mining context. To this end, the following baseline recording activities for Aboriginal and non-Aboriginal sites are detailed below.

7.6.1.1 Aboriginal Sites

The preparation of a detailed baseline recording for Aboriginal heritage items requires the following:

- imaging laser scanning or 3D photogrammetry of all shelter interiors and features;
- high resolution 3D photogrammetry of sites of high significance;
- imaging laser scanning or photogrammetry of shelter exteriors where possible;
- comprehensive photographic coverage of shelters and grinding groove sites using high resolution digital photography, showing art and panels in their wider context and in relation to each other;

- art panels to be digitally photographed at scales appropriate to their size and complexity, including:
 - i. single frame coverage of the panel;
 - ii. if required, set distance scale photography for montage of the panel (digital only);
 - iii. single frame coverage of individual motifs;
 - iv. if required, set distance scale photography for montage of individual motifs (digital only); and
 - v. where informative, close-up photography of notable features of the rock art (e.g. superimposition of motifs or media) and its context (e.g. joints, cracks, existing rock falls, seepage, mineral or organic accretions).
- spherical photographic coverage using high resolution digital photography and appropriate image stitching techniques at selected sites;
- photographic records of monitoring points;
- construction of 3D renders/models with point-cloud and imagery data stored by ICHPL and made available to RAPs;
- elevation plans of shelter walls recording structural and surface features including, but not limited to, the art, graffiti, joints, bedding planes, exfoliation scars, cracks, mineral and micro-organism growth, drip line and water seepage locations; and
- the identification and recording through digital photography of specific monitoring points, informed by Sefton (2000) and Biosis Research (2007), generally being pre-existing cracks, joints, areas of seepage located on or adjacent to art panels, or in other parts of the shelter.

Baseline recording must be undertaken by an appropriately qualified heritage specialist of Aboriginal heritage sites within a longwalls 35° angle of draw prior to longwall extraction. The report on the baseline recording will be kept/stored in either an ACHA, Due Diligence Assessment or Aboriginal Heritage Management Plan.

When an archaeologist records a site during baseline recording, they are required to submit that information to Heritage NSW. Heritage NSW will either record the site in AHIMS (and issue a site#) or update the existing information for the site if it is an updated baseline recording.

The report will include a detailed description of each site recorded, including in the case of rock art sites a full list of the art present describing media, application techniques and motif types. In addition, the rock art present at each site shall be interpreted using an appropriate level of observation (the more complex the site the more detailed the interpretation), including digital enhancement where appropriate (David et al. 2001). iDStretch is one of the applications that is available to be used by a suitably qualified heritage specialist.

Shelter sites with deposit and/or PAD will be recorded in the same manner as described above with additional description of visible objects, the potential for deposit and undisturbed soil profile.

Various forms of dating are available to date rock art sites (e.g. mud wasp nests) and other site types. These options will be considered in consultation with the University of Wollongong and will be referred to a suitably qualified heritage specialist.

The photogrammetry data will be used to derive 3D models to a precision of approximately 4 mm/10 m, from which plans and sections will be digitally derived.

A digital archive of the baseline recording will be produced and made available to the RAPs for their inspection.

7.6.1.2 Non-Aboriginal Sites

The preparation of a detailed baseline dilapidation recording for non-Aboriginal heritage items should be a component of a Property Subsidence Management Plan (PSMP). The baseline recording requires the following:

- site Identification of individual components or features of the heritage item, including an assessment of features that may be more robust and hence can tolerate greater subsidence effects (e.g. sturdy exterior walls), and components or features that are at higher risk of damage due to their state of repair or construction (e.g. existing deteriorated render);
- the types of damage to the heritage fabric that can be repaired without loss of heritage values (e.g. cracks in internal painted masonry walls); and
- consideration of the risk of damage to individual components or features of the heritage item with the predicted subsidence effects, and whether stabilisation methods are available to readily reduce the risk of subsidence damage to that component or feature.

Baseline recording must be undertaken prior to subsidence movements from longwall mining at the site and a report and archival material shall be submitted to Heritage NSW and relevant council libraries as required.

7.6.2 Monitoring and Impact Management

7.6.2.1 Aboriginal Sites

The general schedule for subsidence monitoring programs for Aboriginal sites includes the following:

- baseline recording: at Aboriginal heritage sites within a longwall's 35° angle of draw prior to longwall extraction;
- impact assessment recording: three to six months after each predicted subsidence movement at the site (that is when a longwall makes its closest traverse to the site), and/or following completion of the longwall; and
- final assessment recording: at the completion of all subsidence movements at the site. The results of the assessment to be reported in End of Panel (EoP) Reports and/or Annual Reviews.

Any impacts will be assessed by comparing the results of the impact recording stages with the baseline data. Movement at and within the site will be monitored by comparing observations of the monitoring points, and general observations of the surrounding landscape and whether it shows evidence of subsidence impact.

If there are subsidence impacts to any sites observed during monitoring, then management actions will be implemented in accordance with the contingency plans described in Section 9.

In all cases monitoring will only be conducted when a site and condition specific risk assessment determines it is safe to do so.

Dependent on the subsidence related impacts recorded, the type of site and the significance of the site, longer term monitoring may be undertaken.

7.6.2.2 Non-Aboriginal Sites

On the basis of the pre-mining inspection, a subsidence monitoring program will be developed for non-Aboriginal heritage items in consultation with the relevant owners. Observational monitoring should be undertaken to identify potential subsidence impacts to the fabric of the building and/or its interior as part of the PSMP.

If an impact or change is observed to a non-Aboriginal heritage item, then management actions will be implemented in accordance with the contingency plans described in Section 9.

In all cases monitoring will only be conducted when a site and condition specific risk assessment determines it is safe to do so.

7.6.3 Archaeological Excavation

Archaeological excavation may be required for heritage items that may be harmed or destroyed. The purpose of archaeological excavation is to increase visibility of deposits and provide further information on the Aboriginal cultural heritage values or non-Aboriginal heritage items present within the Subject Area. The data gathered contributes to the understanding of site characteristics and local and regional prehistory. The results assist in formalising appropriate management recommendations for the proposed works and any archaeological material recovered.

Archaeological excavation for Aboriginal and non-Aboriginal sites will be undertaken in accordance with the following procedures. Excavation methodologies for excavations relating to potential Aboriginal objects would be developed in consultation with the RAPs. and Heritage NSW.

Where practical, the footprint for surface infrastructure will be amended to avoid impact to heritage items or Aboriginal objects if the results from test excavations is considered significant.

7.6.3.1 Aboriginal Sites

An excavation methodology for any Aboriginal sites associated with areas that will be directly harmed by any surface works will be developed in accordance with the following guidelines:

- *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (2010); and
- Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (2011).

Excavation strategies for Appin Mine are not limited by the archaeological excavation restrictions in the Code of Practice. However, excavation should use methodologies appropriate to the site type being excavated. The excavation strategy should clearly define:

- excavation methodology, including any hand or mechanical excavation requirements and how the excavation will be recorded;
- the size (m²) and extent of any excavation works to be undertaken;

- specific research questions that the results of the excavation will attempt to answer and will guide the excavation strategy - appropriate research questions will be developed in consultation with RAPs and Heritage NSW; and
- protocols for the long-term storage, reburial or care of any Aboriginal objects recovered during excavation. These protocols will be developed in consultation with RAPs and Heritage NSW.

Survey, test excavation, and salvage methodologies will be developed for the relevant HMPs and Extraction plans and be provided to the RAPs and Heritage NSW for review where required.

A report detailing the methods and outcomes of any excavation will be provided to RAPs for a minimum period of 28 days for review and comment prior to being submitted to Heritage NSW within six (6) months of the completion of the excavation.

7.6.3.2 Non-Aboriginal Sites

Where there are excavation requirements for any non-Aboriginal heritage sites associated with areas that will be directly harmed by any surface works the excavation will be undertaken in accordance with Heritage NSW guidelines, including:

- NSW Heritage Manual (1996); and
- Historical Archaeology Code of Practice (2006).

Excavations for non-Aboriginal sites must include:

- the development of an Archaeological Research Design (ARD), developed in consultation with Heritage NSW and relevant Councils, that must;
 - i. be informed by an archaeological assessment that predicts the likelihood of archaeological deposits and features;
 - ii. develop clear research questions and objectives that the results of excavation will attempt to answer;
 - iii. develop a site appropriate excavation methodology for investigating likely archaeological deposits and features; and
 - iv. develop contingency plans to appropriately plan for changing excavation conditions; and
- archaeological significance and archaeological impact assessments for each excavation site.

The excavation will be undertaken by an appropriately qualified excavation team that includes or has access to appropriate specialists for the site type being excavated.

An assessment of the cumulative impacts to historical archeological resources across the project area is to be documented.

A report detailing the methods and outcomes of the salvage and any assessment reports will be provided to Heritage NSW and relevant Council within six months of the completion of the excavation. If appropriate, a copy of this report will be lodged with the relevant Council libraries.

7.6.4 Archival Recording

Archival recording may be required for heritage sites that will be directly harmed by any surface works or as part of baseline recording for subsidence monitoring programs.

Archival recording must follow the Heritage Office, Department of Planning(revised 2006) Photographic Recording of Heritage Items using Film or Digital Capture, and the Archival Reports should be lodged with Heritage NSW and appropriate Council Libraries. Typically, an archival recording should include:

- archival research and preparation of an outline history;
- preparation of a statement of heritage significance, if one has not already been prepared;
- base plans, measured drawings and other schematics;
- photographic recordings;
- consideration of recording during demolition;
- samples of materials and finishes;
- an inventory of significant items; and
- recording of oral history if relevant.

8 Preparation of Conservation Management Plans

The preparation of CMPs and/or photographic and archival recordings for potentially affected non-Aboriginal heritage items is required in accordance with Condition 24 of Schedule 4 of the Project Approval. For individual non-Aboriginal heritage items of state and/or national heritage significance, CMPs will be prepared as part of the Extraction Plan or other Management Plan process and prepared in accordance with the Burra Charter, James Semple Kerr's The Conservation Plan and Heritage NSW guidelines. Heritage NSW, relevant Councils and local historical organisations will be consulted where appropriate in the preparation of CMPs.

Electronic copies of the CMP and any associated archival recordings will be lodged with Heritage NSW and relevant Council as required. CMPs will be made available as an appendix in the HMP on the GM³ website ([link](#)), in accordance with Condition 11 of Schedule 6 of the Project Approval.

9 Contingency Plans/Adaptive Management

Contingency plans will be implemented in the case of unanticipated finds or impacts to heritage sites. Future HMPs prepared for Extraction Plans and surface infrastructure management plans will contain site specific and targeted contingencies that take precedence over the general requirements outlined below.

Where any exceedance of the criteria and/or performance measures has occurred, the Proponent must, at the earliest opportunity:

- a) take all reasonable and feasible steps to ensure the exceedance ceases and does not recur;
- b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing these options and any preferred remediation measures or other course of action; and
- c) implement remediation measures as directed by the Planning Secretary to the satisfaction of the Planning Secretary.

9.1 Impacts Occur to an Aboriginal Site

In the event that impacts are identified to an Aboriginal site the following should occur.

- **Discovery:** If impacts are identified during any surface works, all works in the vicinity of the site must cease.
- **Notification:** The Department, RAPs and Heritage NSW will be notified of the find and the process as outlined in the Environmental Compliance/Conformance Assessment and Reporting Procedure will be followed.
- **Management Actions:**
 - i. In consultation with Heritage NSW, RAPs, the Department and a qualified heritage specialist, the site will be inspected, and a management strategy developed. Suitably qualified specialists will be brought in to assist as required.
 - ii. The management strategies will be developed with Heritage NSW and the RAPs and implemented in accordance with current conservation practice and the conservation principles contained within the Burra Charter.
 - iii. An appropriate monitoring program will be developed to report on the effectiveness of the management strategy.
- **Reporting:** A report detailing the impact, details of consultation, management actions undertaken and effectiveness of management actions will be completed by a suitably qualified heritage professional within six (6) months of the completion of the impact monitoring program. A copy of this report will be provided to the Department and Heritage NSW.

9.2 Impacts Occur to a non-Aboriginal Site

In the event that impacts are identified to a non-Aboriginal site the following should occur:

- **Discovery:** If impacts are identified during any surface works, all works in the vicinity of the site must cease.
- **Notification:** the Department, relevant Council/s and Heritage NSW will be notified of the find and the process as outlined in process as outlined in the Environmental Compliance/Conformance Assessment and Reporting Procedure will be followed.
- **Management Actions:**
 - i. In consultation with Heritage NSW, relevant Council(s), the Department and appropriate specialists, the site will be inspected, and a management strategy developed. Suitably qualified specialists will be brought in to assist as required.
 - ii. The management strategies will be implemented in accordance with current conservation practice and the conservation principles contained within the Burra Charter, and industry best practice.
 - iii. An appropriate monitoring program will be developed to report on the effectiveness of the management strategy.
- **Reporting:** A report detailing the impact, details of consultation, management actions undertaken and effectiveness of management actions will be completed by an appropriate specialist within six months of the completion of the impact monitoring program. A copy of this report will be provided to the Department, relevant Council(s) and Heritage NSW.

Appropriate specialists will vary depending on the specific site in question but may include:

- an historical archaeologist;
- a conservator;
- a conservation architect; and/or
- a structural engineer.

In the event of an unexpected (non-Aboriginal) find (relic) on site, the find will be notified in accordance with the requirements of Section 146 of the *Heritage Act 1977*.

9.3 Discovery of Unanticipated Aboriginal Cultural Material

All Aboriginal places and objects are protected under the *NPW Act*. This protection extends to Aboriginal objects and places that have not been identified but might be unearthed during construction. The following contingency plan describes the actions that will be taken in instances where Aboriginal cultural material is discovered. Any such discovery in the study area will follow these steps.

- **Discovery:** Should unanticipated Aboriginal cultural material be identified during any surface works, works will cease in the vicinity of the find. An exclusion zone and temporary fence of ten (10) metres should be established around the cultural material whilst the RAPs are consulted for appropriate action.
- **Notification:** the Department and Heritage NSW will be notified of the find and the process as outlined in the Environmental Compliance/Conformance Assessment and Reporting Procedure will be followed.
- **Management:** In consultation with Heritage NSW, RAPs and a suitably qualified heritage specialist, a management strategy will be developed to manage the identified Aboriginal cultural material. The management strategy will be incorporated into the relevant HMP.
- **Recording:** Any previously unrecorded Aboriginal heritage sites identified during fieldwork (for example but not limited to: baseline recording, supplementary fieldwork, pre-clearance surveys, monitoring, follow-up inspections to assess the effectiveness of mitigation/management/remediation measures) will be recorded using the standard Heritage NSW AHIMS site card. This information will be submitted to Heritage NSW for registration on AHIMS. Any previously unrecorded sites will also be subject to subsidence risk and impact assessments, and a scientific (archaeological) and cultural significance assessment. This will be prepared in consultation with the RAPs. All mapping in the relevant management plans will be updated to include the location of any new finds to prevent inadvertent impacts from other operation activities. Any previously unrecorded Aboriginal heritage sites will be managed in accordance with the requirements of this HMP. The Department will have the authority to approve the HMP that covers impact to new finds.

Consultation will be undertaken with other agencies and RAPs as required.

9.4 Discovery of Unanticipated Human Remains

The following actions will be taken in instances where human remains or suspected human remains are discovered. Any such discovery in the study area will follow these steps.

- **Discovery:** If suspected human remains are discovered all activity in the vicinity of the human remains must stop to ensure minimal/no additional damage is caused

to the remains. The remains must be left in place and protected from harm or damage. The area containing the suspected human skeletal remains should be fenced off and isolated from access. Any soils excavated from the location of the burial (including all soils that have been recently removed from the works site) should be immediately identified, recovered (if removed from site) and stored adjacent to the potential burial.

- **Notification:** Once suspected human remains have been found, the NSW Police must be notified immediately. Should NSW Police confirm the origin of the remains as non-human and provide a case number for ICHPL's records, no further action shall be taken. Following this, if the human remains are of suspected Aboriginal ancestral origin, the Department, Heritage NSW and representatives of the RAPs will be notified of the find and the process as outlined in the Environmental Compliance/Conformance Assessment and Reporting Procedure will be followed.
- **Management:** If the human remains are of Aboriginal ancestral origin an appropriate management strategy will be developed in consultation with RAPs, a suitably qualified heritage specialist and Heritage NSW. If the human remains are identified as historical relics, then an appropriate management strategy will be developed in accordance with the Heritage NSW Skeletal Remains Guidelines. If the exhumation of human remains is subsequently required, these works must be undertaken in accordance with the *Public Health Act 1991* exhumation guidelines and relevant heritage guidelines.
- **Recording:** The find will be recorded in accordance with the requirements of the *NPW Act*, *Heritage Act 1977*, *Public Health Act 1991* and Heritage NSW guidelines as appropriate.

10 Complaints and Compliance Management

10.1 Complaints and Dispute Resolution

ICHPL has a 24 hour, free call community hotline number (1800 102 210) and email address (community@gm3.au) which is displayed at ICHPL Projects and Mine Sites, and included in newsletters, letters and other correspondence. The call line and email address are for all complaints and general enquiries regarding environmental or community issues associated with ICHPL's operations can be reported.

Community complaints and enquiries may also be received in person by any employee of GM³, with details to be immediately shared with the relevant operations personnel for investigation. All complaints received in relation to Appin Mine will be managed in accordance with the Community Complaints Procedure.

Upon receipt of a community complaint, preliminary investigations will commence as soon as practicable to determine the likely cause of the complaint. The complainant will receive an acknowledgement of their complaint within 24-hours of its submission. A follow up response will be provided as soon as practicable after a detailed investigation has been completed.

A summary of all complaints received during the reporting year is provided as part of the Annual Review. A log of complaints is also maintained on the GM³ website at: [link](#).

10.2 Events, Non-Compliance, Corrective Action and Preventative Action

Events, non-compliances, corrective actions and preventative actions are managed in accordance with the Reporting and Investigation Standard and Environmental Compliance/Conformance Assessment and Reporting Procedure. These procedures, which relate to all ICHPL operations, detail the processes to be utilised with respect to event and hazard reporting, investigation and corrective action identification. The key elements of the process include:

- identification of events, non-conformances and/or non-compliances;
- recording of the event, non-conformance and/or non-compliance in the event management system GM360;
- investigation/evaluation of the event, non-conformance and/or non-compliance to determine specific corrective and preventative actions;
- assigning corrective and preventative actions to responsible persons in GM360; and
- review of corrective actions to ensure the status and effectiveness of the actions.

Incidents, exceedances or non-compliances associated with heritage will be reported to all relevant stakeholders as detailed in Section 11.2.

10.3 Monitoring Compliance with Project Approval Performance Conditions

Schedule 3 of the Project Approval provides subsidence performance measures for Aboriginal and historical heritage features as listed in Appendix 2. In regard to the performance measures described in Appendix 2, "negligible" is defined as "small and unimportant, such as not to be worth considering" and "minor" is defined as "not very large, important or serious". Monitoring compliance with Project Approval performance conditions for heritage sites is discussed in Section 7.6.

Compliance with Project Approval performance conditions for Aboriginal and non-Aboriginal heritage is monitored through subsidence monitoring and surface works programs by responsible site personnel or specialist contractors as appropriate. Monitoring results are published in End of Panel, Salvage and other reports as required. Monitoring Reports and results will be made available on the GM³ website at: [link](#).

10.4 Investigating Environmental Performance

Condition 2 (f) of Schedule 6 of the Project Approval requires that a program be implemented to investigate and implement ways to improve the environmental performance of the project over time.

ICHPL has committed to fund research to develop improved scientific understanding of subsidence impacts and environmental consequences as detailed in the Environmental Research Program. It is also anticipated that additional information in regards to improving environmental performance relative to Aboriginal and non-Aboriginal heritage will be gathered as part of EoP reports, impact management reports, incident reports, audit reports, annual reviews and heritage industry papers and reports.

11 Reporting and Review

11.1 Reporting

The results of monitoring and research are compiled and reported to internal and external stakeholders (as required). The reports include:

- Annual Review (for mining leases and Project Approval); and
- EoP reporting for mining areas.

11.1.1 Annual Review

ICHPL will report on the performance of the HMP in the Annual Review.

The Annual Review will include:

- monitoring results and comparison to performance criteria;
- heritage related complaints and management/mitigation measures undertaken;
- management/mitigation measures undertaken in the event of any confirmed exceedance of performance criteria; and
- review of the performance of management/mitigation measures and the monitoring program.

The Annual Review is prepared in accordance with the requirement of Condition 4 of Schedule 6 of the Project Approval and is to be submitted to relevant agencies in September each year. Annual Reviews are made available to the general public via the GM³ website.

11.1.2 End of Panel Reports

EoP reports are prepared within four months of completion of each longwall panel. The reports provide an overview of subsidence effects, both individual and cumulative. The reports describe all subsidence impacts in detail and discuss environmental consequences for watercourses, swamps, water yield and quality, aquatic and terrestrial ecology, groundwater, and cliffs and steep slopes and also describe impacts to heritage features. The reports compare subsidence impacts and environmental and heritage consequences against predictions.

11.2 Incident, Non-compliance and Exceedance Notifications

11.2.1 Notification of Incidents – Government Agencies

In accordance with Condition 7 of Schedule 6 of the Project Approval, ICHPL will notify the Planning Secretary and any other relevant agencies as soon as practicable after ICHPL identifies or is made aware of the incident⁶. Reports are to be provided in accordance with the requirements set out in Appendix 7 of the Project Approval.

RAPs will be notified of any incidents involving Aboriginal heritage. ICHPL will provide a detailed report of any incident to any relevant agencies and RAPs if the incident involves Aboriginal heritage.

⁶ The definition of an incident in the Project Approval is “A set of circumstances that causes or threatens to cause material harm to the environment; and/or breaches or exceeds the limits or performance measures/criteria in this approval”

If impacts to a heritage site occur that are not in accordance with an approved management plan, notification to the EPA Environment Line (131 555) and to the Department (compliance@planning.nsw.gov.au) is required as soon as practicable.

11.2.2 Notification of Non-compliances – Government Agencies

In accordance with Condition 7A of Schedule 6 of the Project Approval, the Planning Secretary must be notified in writing via the Major Projects website within seven (7) days after becoming aware of a non-compliance⁷.

The EPA is also to be notified of the non-compliance (via email).

11.3 Review of HMP

The HMP will be reviewed periodically in accordance with the review period on the document.

In accordance with Condition 5 of Schedule 6 of the Project Approval, the HMP will be reviewed, and if necessary revised, within three (3) months, of:

- the submission of an annual review;
- the submission of an incident report;
- the submission of an Independent Environmental Audit (IEA) report; and
- any modification to the conditions of the Project Approval (unless the conditions require otherwise); or
- a direction of the Planning Secretary under Condition 4 of Schedule 2.

Outcomes from each review will be documented in the Management Plan Review Log (unless the HMP is being updated as part of the review). The HMP will only be revised where a material change to site operations or environmental management has occurred, or in accordance with the review period on the HMP. Administrative or descriptive changes do not constitute a material change.

Where a review triggers a revision of the HMP, the HMP will be revised and submitted to the Planning Secretary for approval. Once approved, the HMP will be uploaded to the IMC website.

The approved HMP will be implemented.

Details for the preparation of future HMPs is provided in Section 7.

11.4 Audits

11.4.1 IEA

In accordance with Condition 9 of Schedule 6 of the Project Approval, an IEA shall be commissioned every three years, that will include a review of the HMP. The report, together with the response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations, is required to be submitted to the Planning Secretary within six (6) weeks of completion of the audit, in accordance with Condition 10 of Schedule 6.

⁷ A non-compliance that has been notified as an incident does not need to also be notified as a non-compliance.

The IEA is also undertaken to comply with Condition 18 of EPBC Approval 2010/5350. A copy of the report is also submitted to the Commonwealth Department of Climate Change, Energy, the Environment and Water to satisfy Condition 18 (g).

IEAs have been conducted in 2013, 2016/17, 2019 and 2022, with the next IEA scheduled to be conducted in 2025. Recommendations from the IEA will be incorporated into the HMP where appropriate.

11.4.2 ISO 14001

As part of the ISO 14001 certification, ICHPL maintains an environmental auditing and governance program across all of its operational sites. The program, which includes the use of competent internal personnel and accredited external auditors, is an integral part of maintaining certification under the ISO 14001 standard.

External surveillance audits are undertaken on an annual basis, with recertification audits undertaken every three (3) years.

Internal Governance Reviews of the HMP are nominally undertaken on a two (2) yearly basis.

12 Acronyms

Term	Definition
ACHA	Aboriginal Cultural Heritage Assessment
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal heritage impact permit
AMVA	Appin Mine Ventilation and Access Project
ARD	Archaeological Research Design
BSO	Bulli Seam Operations
CCC	Community Consultative Committee
CMP	Conservation Management Plan
CWEA	Coal Wash Emplacement Area
DCCEEW	Department of Climate Change, Energy, the Environment and Water, formerly: • Department of the Environment, Climate Change and Water (DECCW) • Office of the Environment and Heritage (OEH)
Department	Department of Planning, Housing and Infrastructure, previously • Department of Planning and Environment (DPE) • Department of Planning, Infrastructure and Environment (DPIE)
EA	Environmental Assessment
EMS	Environmental Management System
EoP	End of Panel
EPA	Environment Protection Authority
<i>EP&A Act</i>	<i>Environmental Planning and Assessment Act</i>
EPBC	Environment Protection and Biodiversity Conservation
EPL	Environment Protection Licence
FY	Financial year
GM360	ICHPL event reporting system
HMP	Heritage Management Plan
ICOMOS	International Council on Monuments and Sites

ICHPL	Illawarra Coal Holdings Pty Ltd
IEA	Independent Environmental Audit
IMC	Illawarra Metallurgical Coal
km	kilometre
LEP	Local Environment Plan
MPHMC	Michael Pearson Heritage Management Consultants Pty Ltd
Mtpa	Million tonnes per annum
NAHA	Non-Aboriginal Heritage Assessment
<i>NPW Act</i>	<i>National Parks and Wildlife Act</i>
NSW	New South Wales
PAD	Potential archaeological deposits
<i>POEO Act</i>	<i>Protection of the Environment Operations Act</i>
PSMP	Property Subsidence Management Plan
RAP	Registered Aboriginal Party
RoM	Run of Mine
SHR	State Heritage Register
WCCPP	West Cliff Coal Preparation Plant

13 References

Bulli Seam Operations Project Approval 08_0150, as modified

Biosis Research 2008. West Cliff Area 5 Longwall 32 End of Panel Report Cultural Heritage. A report to ICHPL.

Biosis Research, 2009. Bulli Seam Operations Aboriginal Cultural Heritage Assessment. A report to ICHPL.

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DECCW (2010) Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales.

IESC (2014). Subsidence from longwall coal mining factsheet.

Michael Pearson Heritage Management Consultants Pty Ltd, 2009. Bulli Seam Operations non-Aboriginal Heritage Assessment. A report to ICHPL.

Niche Environment and Heritage (2021) Aboriginal Cultural Heritage Assessment Report Appin Ventilation and Access Project. An unpublished report for South32- Illawarra Metallurgical Coal.

NSW Minerals Council (2010) NSW Minerals Industry Due Diligence Code of Practice for the Protection of Aboriginal Objects. Sydney

Sefton, C. (2000) Overview of the Monitoring of Sandstone Overhangs for the Effects of Mining Subsidence Illawarra Coal Measures. An unpublished report prepared for Illawarra Coal.

Stakeholder Engagement Management Plan (IMCMP0016)

Community Complaints Procedure (IMCP0112)

Environmental Compliance/Conformance Assessment and Reporting Procedure (IMCP0186)

Reporting and Investigation Standard (IMCSTD0069)

Coal Wash Emplacement Area Management Plan (WCPMP0019)

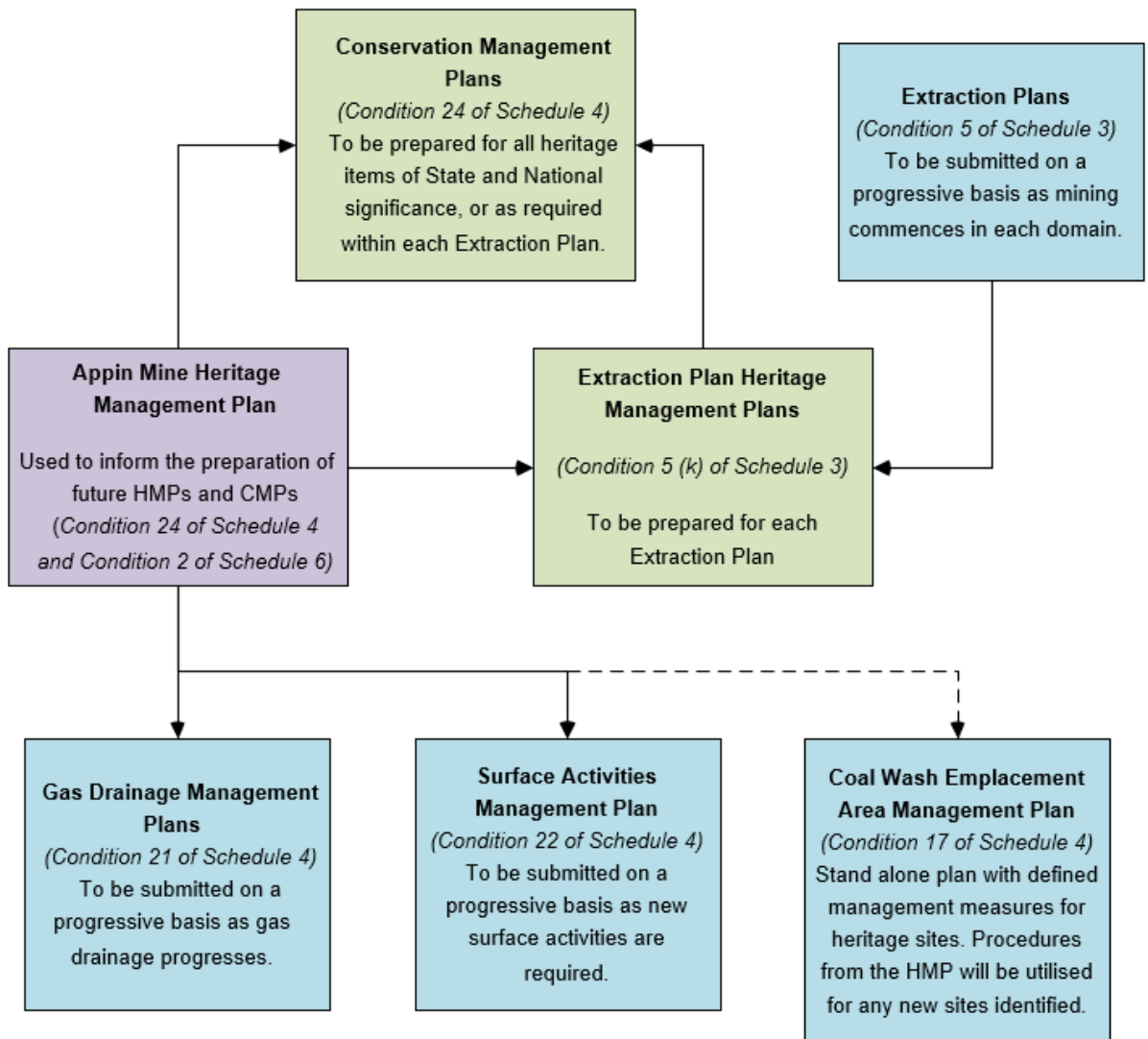
Surface Activities Management Plan (APNMP0129)

Gas Drainage Management Plan (APNMP0114)

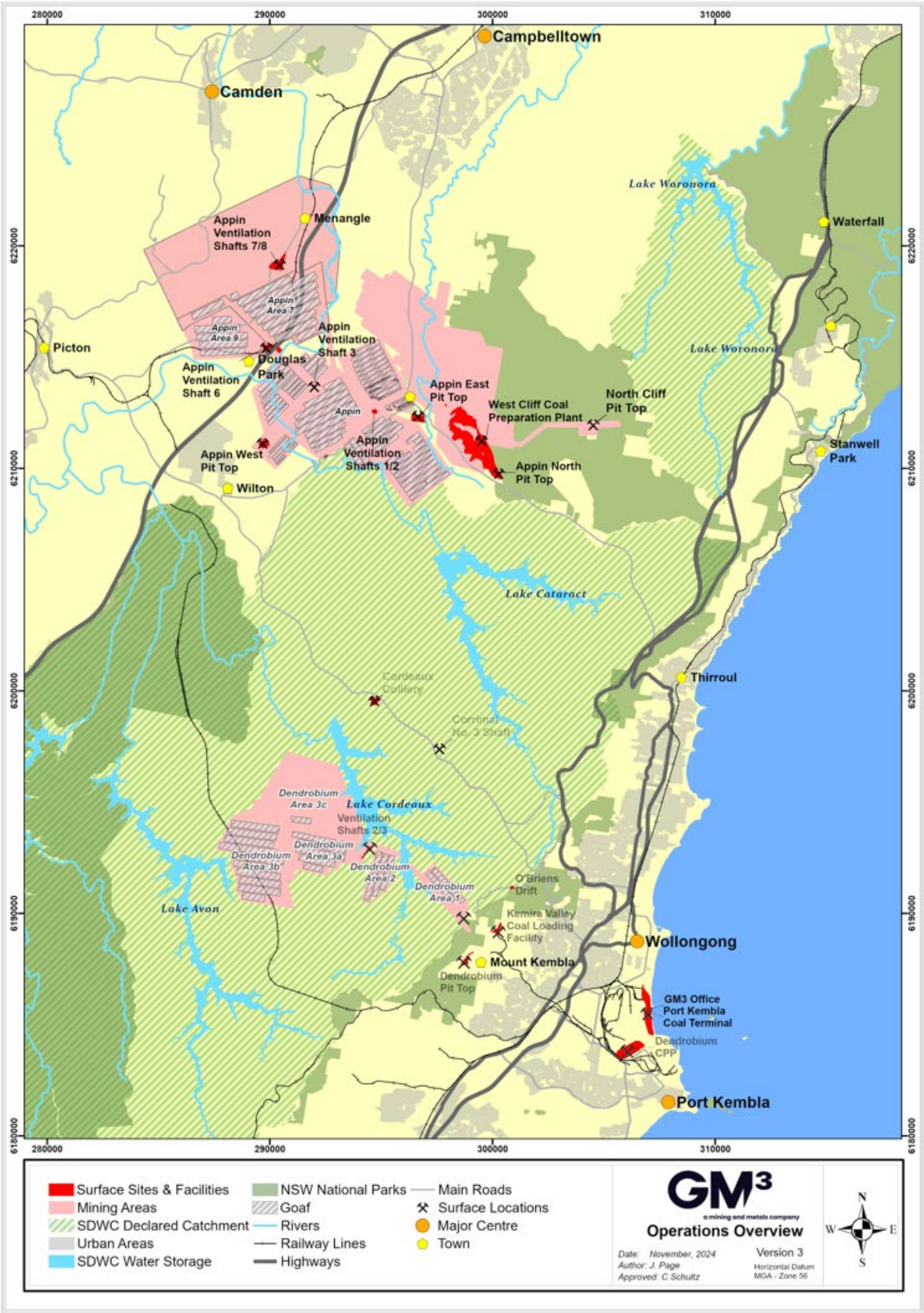
Aboriginal Cultural Heritage Management Plan Appin Mine Ventilation and Access Project (APNMP0216) (note that this document is now obsolete).

14 Plans/Figures

Figure 1: Heritage Management Strategy



Plan 1: Appin Mine Locality Plan



LEGEND

- Existing Mining and Exploration Tenements
- Extent of Longwall Mining Area
- Extent of Longwall Mining Area No Longer Sought
- Railway
- Project Application Area

0 2 4 6 8 10
Kilometres

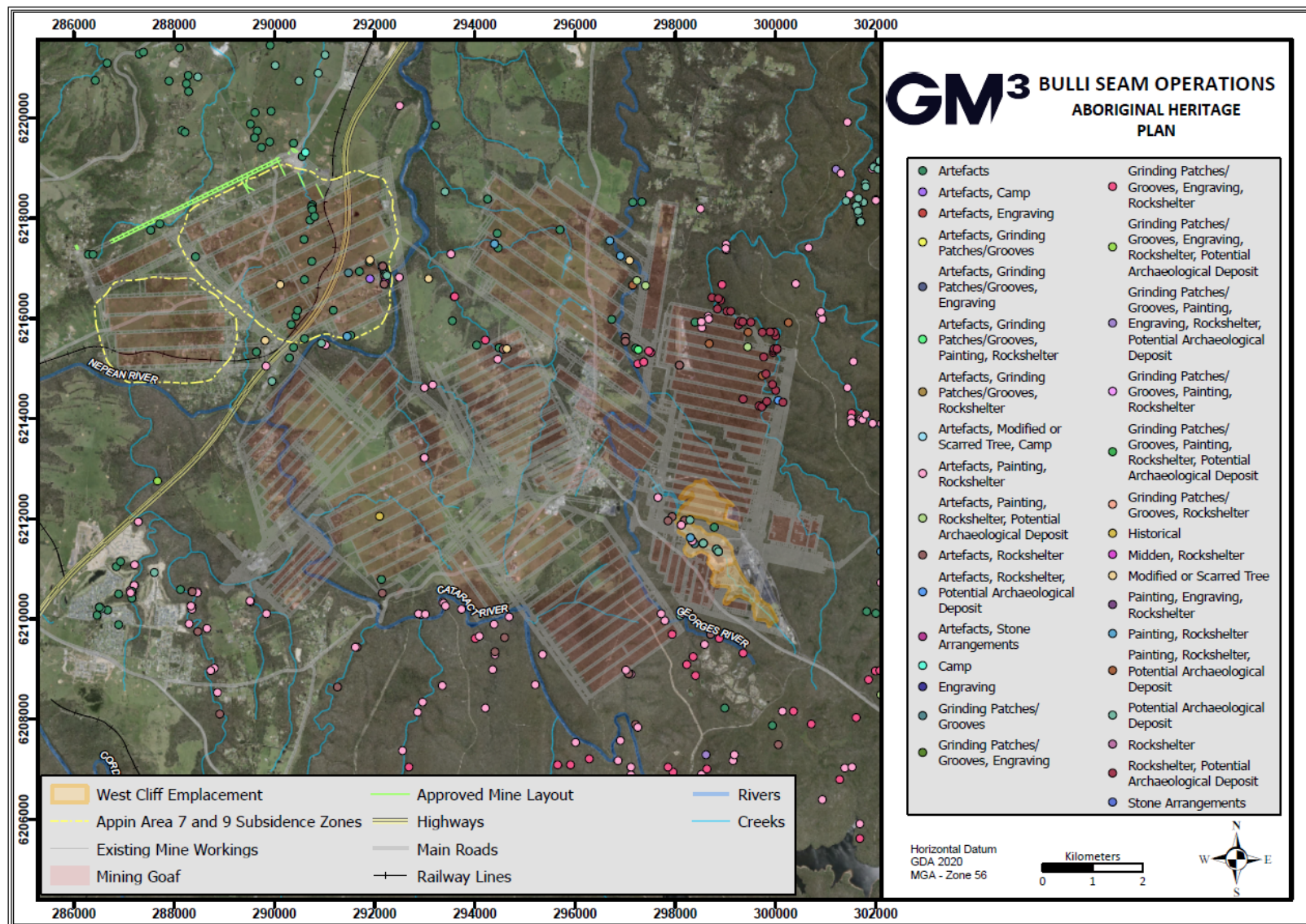
Note: Project Area excludes all land within the Illawarra Escarpment State Conservation Area and Dharawal State Conservation Area with the exception of Lots 12, 46 and 63 within Deposited Plan 752066 and portion of CAD ID 104384639.

Source: Illawarra Coal, 2007; Topographic Map Base - (Sydney Special, Wollongong Special)
Geoscience Australia, 2006; Reserve Boundaries - Department of Lands NSW 2003 and Sydney Catchment Authority Special Areas - Sydney Catchment Authority, 2006

BULLI SEAM OPERATIONS ATTACHMENT 1
Proposed Project Application Area

bhpbilliton

Plan 3: Heritage Sites within BSO Project Area



15 Appendices

Appendix 1 : Project Approval Conditions- Heritage Management

Condition	Requirement	Section
Condition 1 of Schedule 2	Obligation to minimise harm to the environment In addition to meeting the specific performance criteria established under this approval, the Proponent shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the project.	Section 5
Condition 2 of Schedule 2	Terms of Approval The Proponent must carry out the project: (a) generally in accordance with the EA, Statement of Commitments and PPR; (b) in accordance with the conditions of this approval; and (c) in accordance with any written directions of the Planning Secretary.	Section 3.1
Condition 4 of Schedule 2	Consistent with the requirements of this approval, the Planning Secretary may make written directions to the Proponent in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this approval, including those that are required to be, and have been, approved by the Planning Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in condition 4(a).	Section 3.1
Condition 24 of Schedule 4	The Proponent shall update the approved Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must:	This document
	(a) be prepared in consultation with Heritage NSW, the Aboriginal community, Council, any local historical organisations and relevant landowners;	Section 1.5
	(b) be submitted to the Planning Secretary for approval by 31 January 2017	Date is in the past
	(c) include the following program/procedures for managing Aboriginal heritage management within the project area:	Section 7

	• recording, salvaging, excavating and/or managing the Aboriginal sites and potential archaeological deposits within the site; • conserving, managing, and monitoring the Aboriginal sites outside the site; • managing the discovery of any new Aboriginal objects or skeletal remains during the project; • maintaining and managing access to archaeological sites by the Aboriginal community; and, • ongoing consultation and involvement of the Aboriginal communities in the conservation and management of Aboriginal cultural heritage within the project area.	Section 7.6.3 Section 7.5 Section 9 Section 6.6 Section 6.5
	(d) include the following program/procedures for managing other heritage on site:	
	• preparing conservation management plans and/or photographic and archival recording of potentially affected heritage items; • making the conservation management plans and photographic and archival recording publicly available for buildings or structures of State or National heritage significance once they are completed; • protection and monitoring of heritage items outside the site; • baseline dilapidation surveys of all heritage items potentially affected by subsidence and/or blasting; • monitoring, notifying and managing the effects of subsidence and/or blasting on potentially affected heritage items (including the Mountbatten Group); and • additional archaeological excavation and/or recording of any significant heritage items requiring demolition.	Section 8 Section 8 Section 8 Section 8 Appendix 7 Section 7.6
	Note: This plan must be suitably integrated with Heritage Management Plans that form part of Extraction Plans, and the West Cliff Coal Wash Emplacement Area Management Plan.	See relevant Extraction/ Management Plan
Condition 24A of Schedule 4	The Proponent must implement the Heritage Management Plan approved by the Planning Secretary.	Section 11.3
Condition 2 of Schedule 6	Management Plan Requirements The Proponent shall ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include: (a) detailed baseline data; (b) a description of: • the relevant statutory requirements (including any relevant approval, licence or lease conditions); • any relevant limits or performance measures/criteria;	Section 4 Section 3 Appendix 2

	- the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures; (c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; (d) a program to monitor and report on the: - impacts and environmental performance of the project; - effectiveness of any management measures (see c above); (e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; (e) (f) a program to investigate and implement ways to improve the environmental performance of the project over time; (g) a protocol for managing and reporting any: - incident; - complaints; - non-compliances with statutory requirements; and - exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan.	Section 9 Section 7.6 Section 11 Section 9 Section 10 Section 10 Section 7 Section 11.2
Condition 5 k) of Schedule 3	Extraction Plan Include a Heritage Management Plan, which has been prepared in consultation with OEH and relevant stakeholders for both Aboriginal and historic heritage, to manage the potential environmental consequences of the proposed second workings on both Aboriginal and Non-Aboriginal heritage items, and which: a) includes additional investigations (such as surveys and current register searches) for Aboriginal heritage items (including previously known sites) and historic heritage items, sufficient to identify the significance (including "special significance") of all sites which may be impacted by subsidence and to identify any actions required to ensure that the performance measures in Table 1 [see Section 2.4] are met; and b) is prepared in accordance with the relevant requirements for preparation of the Heritage Management Plan required under condition [24] of Schedule 4.	See relevant Extraction Plan
Condition 17 a) and b) of Schedule 4	Coal Wash Emplacement Area Management Plan The Proponent shall prepare a West Cliff Coal Wash Emplacement Area Management Plan for the project to the satisfaction of the Planning Secretary. This plan must be prepared in consultation with BCD and be submitted to the	See Appin Mine Coal Wash Emplacement Area

	Planning Secretary for approval by the end of June 2013. This plan must include: (a) detailed design plans which include options for reducing, avoiding and or managing impacts on Aboriginal heritage sites in and adjacent to the southwestern fringe of the proposed Stage 4 footprint (including sites 52-2-228/3617, 52-2-1373, 52-2-3533/3613 and 52-2-3506); (b) management strategies to ensure no impacts to Aboriginal heritage site 52-2-3505 other than negligible impacts, including consideration of potential staged development of the emplacement and/or buffer areas.	Management Plan
Condition 17A	The Proponent must implement the West Cliff Coal Wash Emplacement Area Management Plan approved by the Planning Secretary.	
Condition 21 c) of Schedule 4	Gas Drainage Management Plan The Proponent shall prepare a Gas Drainage Management Plan in respect of construction and use of future gas drainage infrastructure (i.e. for any gas drainage not subject to approval at the date of this instrument) to the satisfaction of the Planning Secretary. This plan must be submitted to the Planning Secretary for approval prior to the construction of any future gas drainage infrastructure and must include details of the Proponent's commitments regarding: (c) assessment of noise, air quality, traffic, biodiversity, heritage, public safety and other impacts in accordance with approved methods.	See Gas Drainage Management Plan
Condition 21A	The Proponent must implement the Gas Drainage Management Plan approved by the Planning Secretary.	
Condition 22 of Schedule 4	Surface Activities Management Plan The Proponent shall prepare a Surface Activities Management Plan in respect of construction and use of service boreholes, pipelines, electrical infrastructure, works to public infrastructure, communications equipment and monitoring equipment, to the satisfaction of the Planning Secretary. This plan must: (a) be submitted to the Planning Secretary for approval by 30 April 2017, unless the Planning Secretary agrees otherwise; and (b) include the following: • commensurate assessment of noise, air quality, traffic, biodiversity, heritage, public safety and other impacts in accordance with approved methods;	See Surface Activities Management Plan
Condition 22A	The Proponent must implement the Surface Activities Management Plan approved by the Planning Secretary.	
Condition 23, 23A and 23B of Schedule 4	23. The Proponent shall not cause any damage to the Upper Canal during the construction and operation of the Appin East Mine Gas Safety Management Project.	These works have been completed and

	23A. Prior to construction of the Appin East Mine Gas Safety Management Project, the Proponent shall: (a) undertake a dilapidation survey of the Upper Canal, in consultation with WaterNSW and the Heritage Division; (b) prepare final detailed design plans in consultation with WaterNSW; and (c) undertake vibration monitoring for all earthworks undertaken within 25 metres of the Upper Canal, to the satisfaction of the Secretary. 23B. Following the completion of construction of the Appin East Mine Gas Safety Management Project, the Proponent shall: (a) undertake a dilapidation survey of the Upper Canal in consultation with WaterNSW and the Heritage Division; and (b) repair, or pay the full costs associated with repairing, any damage to the Upper Canal caused by the project in consultation with WaterNSW and the Heritage Division, to the satisfaction of the Secretary.	all conditions satisfied.
Condition 3 of Schedule 6	Adaptive Management The Proponent must assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedules 3 and 4. Any exceedance of these criteria and/or performance measures constitutes a breach of this approval and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of the criteria and/or performance measures has occurred, the Proponent must, at the earliest opportunity: a) take all reasonable and feasible steps to ensure the exceedance ceases and does not recur; b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing these options and any preferred remediation measures or other course of action; and c) implement remediation measures as directed by the Planning Secretary to the satisfaction of the Planning Secretary.	Section 9
Condition 4 of Schedule 6	Annual Review By 30 September 2012, and annually thereafter, the Proponent shall review the environmental performance of the project to the satisfaction of the Planning Secretary. This review must:	Section 11.1.1

	(a) describe the development (including any rehabilitation) that was carried out in the past financial year, and the development that is proposed to be carried out over the next year; (b) include a comprehensive review of the monitoring results and complaints records of the project over the past financial year, which includes a comparison of these results against the: • relevant statutory requirements, limits or performance measures/criteria; • requirements of any plan or program required under this approval; • monitoring results of previous years; and • relevant predictions in the EA; (c) identify any non-compliance over the past financial year, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the project; (e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the current financial year to improve the environmental performance of the project.	
Condition 5 of Schedule 6	Revision of Strategies, Plans and Programs Within 3 months of: (a) the submission of an annual review under Condition 4 above; (b) the submission of an incident report under Condition 7 below; (c) the submission of an audit report under Condition 9 below; and (d) any modification to the conditions of this approval, (unless the conditions require otherwise); or (e) a direction of the Planning Secretary under Condition 4 of Schedule 2; the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Planning Secretary.	Section 11.3
Condition 7 of Schedule 6	Incident Notification, Reporting and Response The Planning Secretary must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the project (including the development application number	Section 11.2

	and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 7.	
Condition 7A of Schedule 6	Non-compliance Notification The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance. A non-compliance notification must identify the project and the application number for it, set out the condition of approval that the project is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. <i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.</i>	Section 11.2.2
Condition 8 of Schedule 6	Regular Reporting The Proponent shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval.	Section 11.1
Condition 9 of Schedule 6	Independent Environmental Audit By the end of December 2013, and every 3 years thereafter, unless the Planning Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must: (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any relevant EPL or Mining Lease (including any assessment, plan or program required under these approvals); (d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and (e) recommend appropriate measures or actions to improve the environmental performance of the project, and/or any assessment, plan or program required under the abovementioned approvals. <i>Note: This audit team must be led by a suitably qualified auditor and include experts in any field specified by the Planning Secretary</i>	Section 11.4.1

Condition 10 of Schedule 6	Within 6 weeks of the completion of this audit, or as otherwise agreed by the Planning Secretary, the Proponent shall submit a copy of the audit report to the Planning Secretary, together with its response to any recommendations contained in the audit report.	Section 11.4.1
Condition 11 of Schedule 6	Access to Information From 30 June 2012, the Proponent shall: (a) make copies of the following publicly available on its website: • the documents referred to in Condition 2 of Schedule 2; • all current statutory approvals for the project; • all approved strategies, plans and programs required under the conditions of this approval; • a comprehensive summary of the monitoring results of the project, reported in accordance with the specifications in any conditions of this approval, or any approved plans and programs; • a complaints register, updated on a monthly basis; • minutes of CCC meetings; • the annual reviews of the project; • any independent environmental audit of the project, and the Proponent's response to the recommendations in any audit; • any other matter required by the Planning Secretary; and (b) keep this information up-to-date, to the satisfaction of the Planning Secretary	Section 3.1

Appendix 2: Project Approval - Performance Measures (Condition 1 of Schedule 3)

Feature	Performance Measure
Aboriginal Heritage	
Sites determined to hold “special significance” as a result of studies required for Extraction Plans	Negligible impact or environmental consequence
Sites determined to hold high or moderate significance as a result of studies required for Extraction Plans	Less than 10% of such sites across the mining area affected by subsidence impacts (other than negligible impacts or environmental consequence)
Other Aboriginal heritage sites	Less than 10% of such sites (or 1 such site, whichever is the greater) within any longwall mining domain area is affected by subsidence impacts (other than minor impacts or environmental consequence)
Historic Heritage	
St James Church (Menangle) St Mary’s Tower (Douglas Park)	Negligible loss of heritage value Negligible impact on structural integrity or external fabric
Broughtons Pass Weir	Negligible loss of heritage value
Other buildings or structures of State or National heritage significance	Negligible loss of heritage value Negligible impact on structural integrity or external fabric, unless the owner of the feature agrees otherwise in writing.
Other buildings or structures of identified heritage significance	No loss of heritage value greater than predicted under a Heritage Management Plan prepared under Condition [5, Schedule 3]
Upper Canal	Proponent shall not cause any damage to the Upper Canal during the construction and operation of the Appin East Mine Gas Safety Management Project.

Stakeholder Comments	ICHPL Response
Heritage NSW – Heritage Council of NSW	
Response received 16 September 2021 The following State Heritage Register (SHR) items are located within the project area: • Menangle Rail Bridge and Viaduct (SHR no. 01047); • Menangle Railway Station Group (SHR no. 01191); • Camden Park Estate and Belgenny Farm (SHR no. 01697); • Camden Park (SHR no. 00341); • Wilton Park (SHR no. 00257); • Upper Canal System (SHR no. 01373); • Beulah (SHR no. 00368); and • Cataract Dam (SHR no. 01359). Condition 24d) of the DPIE approval relates to non-Aboriginal heritage, requires that the following program/procedures for managing other heritage on site be included in the Heritage Management Plan: • preparing conservation management plans and/or photographic and archival recording of potentially affected heritage items; • making the conservation management plans and photographic archival recording publicly available for buildings or structures of State or National heritage significance once they are completed; • protection and monitoring of heritage items outside the site; • baseline dilapidation surveys of all heritage items potentially affected by subsidence and/or blasting; • monitoring, notifying and managing the effects of subsidence and/or blasting on potentially affected heritage items (including the Mountbatten Group); and • additional archaeological excavation and/or recording of any significant heritage items during demolition. The following document was submitted: Appin Mine Heritage Management Plan, prepared by South32 Illawarra Metallurgical Coal, dated August 2021. The following comments are provided to address the applicant’s response to the heritage issues raised: • The HMP states that all activities carried out at Appin Mine will be generally in accordance with the Project Approval (as modified) and with the 2009 Environmental Assessment. • Any potential impacts upon the heritage items should be clearly outlined in the report, by expanding the existing table under Appendix 6. If impacts are anticipated, mitigation measures also need to be presented, including protection and	Noted. Noted. Noted. If impacts to any sites are anticipated, mitigation measures will be implemented, including protection and monitoring of heritage items. dilapidation

monitoring of heritage items, dilapidation surveys, subsidence monitoring. - Historical archaeology • The Bulli Seam Operations Non-Aboriginal Heritage Assessment (Michael Pearson Heritage Management Consultants, 2009) has identified 49 heritage items of local and State significance within the project study area. A later survey for Appin Area 9 did not identify any additional heritage items (Biosis Research 2012). A complete list of non-Aboriginal heritage sites within the project area is provided in Appendix 6. • Heritage NSW supports the preparation of CMPs for non-Aboriginal heritage items as appropriate for the project. • Heritage NSW supports the preparation of future HMPs, as required, and the overall proposed methodological approaches for the preparation of HMPs, as discussed in Section 7. • Regarding methodology, it is recommended that the list provided in Section 7.6.3.2 for the excavations of non-Aboriginal sites also include archaeological significance and archaeological impact assessments for each excavation site. It is further recommended that assessment of the cumulative impacts to historical archaeological resources across the project area is documented and included in relevant final reporting. • Section 9.2 outlines the approach to managing unexpected (non-Aboriginal) finds on site. Heritage NSW notes that there is no reference to section 146 of the Heritage Act 1977, in the case of the discovery of (likely) historical archaeological relics. Section 146 of the Heritage Act 1977 is not switched off for SSD (or SSI) projects. • Appendix 2 Project Approval: Performance Measures (Condition 1 of Schedule 3) includes several historic heritage items ('Feature') and the evaluated levels of heritage impact to these items ('Performance Measure'). However, it does not include details or references to how these conclusions were reached. • Heritage NSW supports the lodgement of all final archaeological/heritage reports with the Department as well as relevant Council and/or local history libraries.	surveys and subsidence monitoring. Mitigation measures will be included in either the Extraction Plan or CWEAMP. Noted. Noted. Noted. Section 7.6.3.2 has been updated to include these requirements. Reference to Section 146 included in Section 9.2. This assessment was undertaken in the Environmental Assessment for the BSO Project. The condition in the Project Approval was based on this assessment. Noted.
<u>Comment received 25 July 2024</u>	
The following documents have been provided: • Appin Mine Heritage Management Plan, prepared by South32 Illawarra Metallurgical Coal, dated July 2024 • Conservation Management Plan Mountbatten Group 670 Menangle Road, Douglas Park 2569 NSW, prepared by Niche Environment and Heritage, dated 14 January 2020 As delegate of the Heritage Council of NSW, I note that:	Noted.

- The AMVA project site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items.
- The Appin Mine Heritage Management Plan dated July 2024 includes general updates and inclusion of Appin Mine Ventilation and Access Project (AMVA). It notes: The Historical Heritage Assessment Appin Mine Ventilation and Access Project was prepared by Niche Environment and Heritage (2021, Appendix G of the modification application). In conclusion it stated:
 - An analysis of historical resources has found that the Subject Area has remained largely unchanged from first European settlement and farming of the area. Little to no development has occurred within the Subject Area associated with the identified historical phases.
 - The Subject Area has been assessed to contain no heritage items and have a very low to low potential to contain archaeological resources associated with the identified historical phases.

Based on the above, Heritage NSW has no further comments on the aspects of the Heritage Management Plan relating to non-Aboriginal cultural heritage.

- The Mountbatten Group is not a SHR item. It is a local heritage item on Wollondilly Shire Council Local Environmental Plan 2011 in the vicinity of the Appin Ventilation Shaft No. 6 project within the Bulli Seam Operations project site.
- The CMP for the Mountbatten Group notes:

The subject buildings are vacant and in fair to poor condition. The stable building is in poor condition overall, including substantial storm damage to the roof, damp issues and missing elements. The main issues identified in the Main House by GB&A in 2012 included termite damage to the roof structure and joinery, and damp issues in the north wing.

The mining uses in the vicinity of the site are expected to continue until 2045. Until that time, it is intended to mothball the buildings. During this period of operation IMC will undertake conservation works to the stable and main roof in the Main House. Finding a compatible use for the buildings and undertaking conservation works as soon as practicable is the preferred alternative to assist their conservation.

Requirements for the maintenance and repair of the Stone Stable Building have commenced in accordance with the GB&A 2013 CMP and the

<i>policies found in Section 6 of this CMP (see Appendix C).</i> It is understood that the place will continue to be maintained in accordance with the CMP. The updated CMP will be provided once the five yearly review is complete. It is noted that comments from Heritage NSW on matters relating to Aboriginal cultural heritage have been provided in a separate letter dated 23 July 2024.	
Heritage NSW – Aboriginal Cultural Heritage Regulation	
Response received 7 October 2021 Whole of Plan - No maps showing AHIMS sites within and outside of the project area Provide mapping at an appropriate scale showing all Aboriginal sites inside and outside of the project area that will be managed in relation to the HMP.	Plan 3 has been included.
Whole of Plan - No Aboriginal consultation has been undertaken At a minimum, undertake consultation with the Aboriginal parties identified in the original s90s regarding the impact to sites, proposed mitigation measures, and whether a Care Agreement will be sought.	Consultation with Registered Aboriginal Parties was undertaken for the HMP as outlined in Appendix 4 and for the Extraction Plan and other project plans as required. Additional consultation is planned to be undertaken with Aboriginal groups regarding the management of sites in the CWEA.
Section 1.3 - The MP08_0150 Development Consent conditions includes requirements for a number of other environmental plans to be prepared. It is not clear from this section how the HMP may interact with other plans required under the Consent. 1. Outline how the HMP interacts with other environmental plans to ensure that Aboriginal cultural heritage is considered. 2. Please state whether Aboriginal sites are mapped within other environmental plans to avoid inadvertent impacts.	Clarification provided in Section 1.3. Clarification provided in Section 4.
Section 4.1 - Only 17 of 65 previously recorded Aboriginal sites were inspected or attempted to be inspected during the 2009 survey. 1. Outline how previously recorded sites that cannot be relocated will be managed. 2. Please specify if there is scope to avoid or provide a buffer area of the previously recorded sites.	Additional detail included in Section 4.1.
Section 7.6.1.1 – 1) How will Potential Archaeological Deposit (PAD) in shelters be managed with respect to baseline recording, 2) Will any of the sites be dated and 3) Will any methods be used which could identify non-visible motifs? 1. Update the section to detail baseline recording recommendations for PAD.	Clarification provided in Section 7.6.1.1.

2. Describe the forms of dating that could be used to date rock art sites (e.g. mud wasp nests) and other site types. 3. Outline methods that will be used to identify non-visible motifs.	
Section 7.6.3 - The HMP would benefit from a section providing a general outline of the reasoning and need for test excavation/ salvage and surface collection and relating this to the archaeological excavation methodology. • Include an additional section to provide a general outline of why test excavation/ salvage and surface collection are required. What opportunity is there to avoid impacts to sites based on the results of the test excavations? This section or the text in the HMP itself needs to include criteria for considering the results of the test excavations prior to impact by the project. • Update this section to consider avoidance and/ or redesign of the project footprint if the results of the test excavations is considered significant. This section should explain the circumstances under which the results of the test excavations will trigger the requirement for salvage excavations. • Update this section to define when salvage excavations will be required.	Additional information provided in Section 7.6.3. Additional information provided in Section 7.6.3. Additional information provided in Section 7.6.3.
Section 9.1 - Does not include scope to bring in specialists to assist. • List potential specialists that may be brought in to assist.	Additional text has been provided in Section 9.1 and Section 9.2.
Section 9.3 - This section would benefit by clarifying who makes the final decision about approving impacts to new finds. • Clarify approval role. Will new Aboriginal sites be added to the Development Consent if more are found during works? • Clarify whether new sites will be added to the Development Consent. This section should be revised to include the need for updating the HMP mapping, and all operational maps, with the location of any unexpected finds of Aboriginal objects to ensure the location/s is not inadvertently by any other activities. • Revise this section to require updated mapping of unexpected finds that are confirmed as Aboriginal objects.	Clarification provided in 9.3. It is not anticipated that new sites will be added to the Project Approval (requiring modification). New sites will be included in the relevant management plan. Additional information provided in Section 9.3.
Figure 1 - It is unclear which areas the subplans apply to 1. Add a table detailing which sites will be covered under each HMP subplan. 2. Add a map showing areas to which the different subplans apply. Maps need to be at an appropriate	All sites are covered under the HMP. Refer to the relevant management plan/Extraction Plan for specific sites.

scale to show detail of AHIMS sites covered by each subplan.	
Appendix 5 - The HMP is required to consider impacts to sites up to 600m outside of the project area. Either add sites outside of the project area but covered by the HMP into Appendix 5 or create a separate table of sites.	Sites within the subsidence zone are assessed and included in Appendix 5.
Comments provided on other management plans required under the Project Approval.	Comments related to other management plans have been incorporated into the relevant plan.
<u>Comment received 10 July 2024</u>	
Thank you for your referral seeking advice on the Heritage Management Plan (HMP) dated 1 July 2024 for the above State Significant Development. Thank you for the continued opportunity to comment on the project. Heritage NSW agrees with the mitigation and management measures outlined in the HMP, however additional information and several modifications are required, including: 1. Section 6.4 must be explicit on the timeframes given to the Registered Aboriginal Parties (RAPs) for notification of fieldwork and review of salvage reports and future HMPs.	The following text has been included in Section 7.2 for notification of field work: <i>Invitations to attend scheduled fieldwork will be provided in writing with 10 business days' notice and no less than 5 business days' notice where unscheduled inspections are required. Where there are matters that require rapid assessment and participation, with agreement from RAPs, the 5 days' notice may be less.</i> The timeframe for consultation on the HMP has been included in Section 1.5. <i>Stakeholders will be provided with a minimum of ten (10) business days to provide feedback. Extensions may be provided on request and comments received outside of this period will be reviewed. This may require a review of the approved HMP if considered to be material to heritage management, otherwise they will be recorded and incorporated into the next review.</i> Timeframes for review of salvage reports are already provided in Section 7.6.3.1.
2. Baseline recording outlined in Section 7.6.1 must be updated to reflect similar measures taken in the Southern Coal Fields (i.e., Dendrobium), including photogrammetry recordings and providing baseline recording and monitoring to RAPs, among other measures.	Additional measures noted in the Dendrobium Aboriginal Cultural Heritage Management Plan for Longwalls 22 and 23 have been included.

3. Section 7.6.2.1 must be updated to include provisions for long-term monitoring at regular intervals (e.g., 2, 5, 10 years) at sites that have suffered subsidence impacts to understand the long-term affects that changes to their structure have on the integrity of Aboriginal cultural heritage sites.	Most subsidence from longwall mining occurs within a few weeks after coal extraction. Final compaction of collapsed strata, and subsidence at the surface, generally occurs within 1 to 2 years (IESC, 2014). Any changes to Aboriginal Cultural Heritage sites from subsidence would likely occur within one to two months of mining. Any changes to sites beyond 1-2 years would be a result of natural processes and therefore monitoring any longer than two years after mining is not warranted. The following text has been included: <i>Dependent on the subsidence related impacts recorded, the type of site and the significance of the site, longer term monitoring may be undertaken.</i>
4. Section 7.6.3 must be explicit that survey, test excavation, and salvage methodologies will be developed for the relevant HMPs and Extraction plans and be provided to the RAPs and Heritage NSW for review.	Additional text has been included in Section 7.6.3. <i>Survey, test excavation, and salvage methodologies will be developed for the relevant HMPs and Extraction plans and be provided to the RAPs and Heritage NSW for review where required.</i>
5. Please update Section 10.2 to replace reference to Section 9.2 with 11.2.	Reference updated.
6. Please include contact details of Department of Planning, Housing and Infrastructure (compliance@planning.nsw.gov.au) where non-compliance and/or impacts that exceed expectations are identified.	Reference has been included in Section 11.2.1 for incident reporting. Non-compliance reporting follows a different process as detailed in Section 11.2.2.
7. Please update Plan 3 with relevant site types for each of the ACH sites in the project area.	Plan 3 has been updated to show relevant site types (<i>Note: This plan will not be included in the publicly available document on the website</i>).
Following revision of the Aboriginal Cultural Heritage Management Plan to address the above comments, please resubmit the Plan to Heritage NSW for comment.	The HMP was provided to Heritage NSW for review following the incorporation of comments.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters and comments on the Conservation Management Plan may be provided separately.	Noted.
<u>Response received 26 August 2024</u> Thank for you your referral seeking advice on the updated Heritage Management Plan dated August 2024 for the above State Significant Development. Thank you for the continued opportunity to comment on the project. It is understood that the Heritage Management Plan has been amended to address previous comments provided by Heritage NSW on the version of the document dated July 2024 (Our ref: DOC24/547439). Heritage NSW has reviewed the amended Heritage Management Plan and confirms that the amendments have adequately addressed our previous comments. With respect to Aboriginal cultural heritage, Heritage NSW has no further comments on the proposal at this time.	Noted.
Wollondilly Shire Council	
<u>Response received 7 September 2021</u> WSC have no comments to provide on this Plan. Happy to leave this to state agencies and Aboriginal groups	Noted.
<u>2024 update</u> Multiple attempts made to obtain comment. No response received.	Noted.
Wingecarribee Shire Council	
<u>Response received 10 September 2024</u> I refer to your email to Council regarding the consultation for this project and note this doesn't apply to the Wingecarribee Shire Council area. Thanks for the clarification.	Noted.
Campbelltown City Council	
<u>Response received 26 August 2021</u> Please see attached comments from Council's Heritage Planner in regards to the Plan. Stakeholders: Would recommend that the National Trust NSW be included as a stakeholder. Page 45 Item 39 'Hume Monument', Appin Road Appin should be referenced Campbelltown Local Environmental Plan 2015 Local Heritage Item I56 and State Heritage Inventory Heritage Item ID 1291232 Item 40 Beulah. Notes should reference 'Meadowvale', which has a visual relationship with Beulah's octagonal pavilion and contributes to the significance of the cultural landscape. The only other point which was raised in internal discussion was with regards to Beulah and the NSW Chief Scientist	HMP sent to National Trust for comment. HMP amended to reflect this comment. HMP amended to reflect this comment.

recommendations about the implementation of koala corridor B through the site which we'll just include here as a general consideration.	HMP amended to reflect this comment.
<u>Comment received 20 January 2025</u> Council has reviewed the documentation and does not need to make further comments at this time.	Noted.
Campbelltown and Airds Historical Society Inc	
<u>Response received 24 August 2021</u> We have read your Management Plan with interest, but our Society does not have comments to add.	Noted
Illawarra Historical Society	
No response received.	Noted.
<u>13 August 2024</u> No response received.	Noted
Appin Historical Society	
No response received	Noted.
<u>13 August 2024</u> No response received.	Noted
The Oaks Historical Society	
<u>Response received 30 September 2021</u> We are currently closed due to the pandemic. Unfortunately, we will not be providing a response to your Management Plan.	Noted.
<u>13 August 2024</u> No response received.	Noted
Camden Historical Society	
<u>Response received 16 September 2021</u> I have consulted with the Society's Committee and we are unable to be of any assistance to you.	Noted
<u>13 August 2024</u> No response received.	Noted
National Trust NSW	
<u>Response received 23 September 2021</u> The National Trust of Australia (NSW) would like to acknowledge the proactive contact from South32 and your request for feedback. We understand that the Appin Mine operates under Project Approval 08_0150 for the Bulli Seam Operations Project and its project approval required consultation on the Heritage Management Plan (HMP). We thank you for the opportunity to review the documents related to this project and provide feedback. The documents that we have briefly reviewed are:	Noted.

Appin Mine Heritage Management Plan – South32, 2021 (including appendices – Conservation Management Plan and Statement of Heritage Impact for Mountbatten Group, Niche Environment and Heritage); Non-Aboriginal Heritage Assessment. A report to ICHPL - Michael Pearson Heritage Management Consultants Pty Ltd, 2009; and Bulli Seam Operations Aboriginal Cultural Heritage Assessment, Biosis Research, 2009. This letter details our specific comments and feedback.	
Heritage Management Plan and Supporting Technical Studies We understand that the Heritage Management Plan (HMP) has prepared to guide your programs and procedures for the management of Aboriginal and Non-Aboriginal heritage in the BSO Project study area. Subsequent management plans will be prepared for each Extraction Plan and surface works at later stages. The Heritage Management Plan adequately details the requirements for internal staff and contractors and, somewhat uncommonly, is simple to read, straightforward and a clear explanation of South 32's heritage procedures, requirements and obligations. The HMP is support by the more technical studies listed above (Non-Aboriginal Heritage Assessment and the Aboriginal Cultural Heritage Assessment). These two technical studies contain a solid analysis of the project area and provide detailed guidelines, policies and recommendations for the project. We are concerned that only some of these guidelines, policies and recommendations have been carried through to the HMP. The HMP would benefit from the very reasonable and good recommendations being incorporated in full. In particular, the recommendation for a full Aboriginal Heritage Management Plan for the project area prior to works starting should be implemented, it was a clear recommendation and the project would benefit from its implementation. We would also recommend that, as well as incorporating the two technical study's recommendations and policies into the HMP, there is a requirement for later Extraction Plan HMPs to reference and incorporate these recommendations and policies.	Specific recommendations that relate to potential subsidence impacts to heritage sites are addressed in the HMP submitted as part of the relevant Extraction Plan. The works associated with the Project Approval have been underway since 2012. As noted, specific recommendations that relate to potential subsidence impacts to heritage sites are addressed in the HMP submitted as part of the relevant Extraction Plan.
Mountbatten Conservation Management Plan and Statement We note that the Conservation Management Plan (CMP) for the Mountbatten group of buildings states in its introduction that the stable building has been misidentified in earlier reports as a Chapel. Confusingly, the latter Statement of Heritage Impact (SOHI) for the stabilisation and repair of this building calls it a Chapel at times and a Stable at other times. We recommend that this discrepancy should be resolved before works begin and that a detailed fabric analysis of the building be undertaken to determine its use and function. In	Conservation Management Works on the stable were completed in September 2021.

particular, this fabric analysis should be undertaken as a priority to aid the preparation of a detailed works specification. The proposed works as set out in the SOHI are well intentioned but more detail is needed on how to undertake such works in an appropriate manner for a historic structure (for example, appropriate mortar mixes, appropriate replacement timber types and roof form etc). This should be prepared by a heritage professional with specific expertise in the repair and stabilisation of historic structures of this age and materials to ensure it is a successful and worthwhile stabilisation project.	
<u>13 August 2024</u> No response received.	Noted
Appin Community Consultative Committee	
Feedback received at CCC meeting on 14 September and on 1 October 2021 The CCC requested at the CCC meeting on 14/09/2021 that a summary of comments from the previous CCC meeting minutes be provided as feedback on Mountbatten House: The CCC has been requesting since November 2018 that painting of Mountbatten House be undertaken to prevent rot and maintain the structure, and believes that this could be easily completed and at a low cost. This has been raised at subsequent CCC meetings. The CCC would like to see the timber repaired on the outside of the main house prior to the painting being undertaken. The maintenance of Mountbatten House is a priority for the CCC as there are concerns about the safety of and damage to the property. The CCC is concerned about the time taken to undertake works. The CCC are interested in the long term plans for Mountbatten House and are concerned that a compatible use for Mountbatten House is not being actively sought. The CCC would like to be involved in the decision making process. The CCC are concerned about the lack of consultation when the Conservation Management Plan for Mountbatten House was updated in 2019. The CCC requests that they be provided the opportunity to be involved in the preparation of the next CMP for Mountbatten House, which is planned for 2024. The CCC would like to understand why in Appendix 5 some sites were not inspected and it is listed that it was 'Attempted' only. It was also noted in feedback that: Point 34: Summary of Heritage Significance. The respondent suggests the point should read ".....an exceptional example of a federation period homestead." On page 106: Dot point "Install new" Getters should read Gutters.	ICHPL has been prioritising restoration works on the Stable located in the vicinity of Mountbatten House. Works on Mountbatten House will be undertaken as required in the CMP. When appropriate, ICHPL will involve the CCC in discussions regarding the future use of Mountbatten House. ICHPL will consult with the CCC when the CMP is being reviewed in 2024. Feedback provided directly to CCC. Corrected. This will be corrected in the next version of the CMP.
<u>Response received 8 August 2024</u> Mountbatten Group	

Regarding the main house, we note no action has been taken in response to our 2021 comments (p54,55 of the HMP). We FORCEFULLY restate these concerns, in particular with regard to the exterior timberwork and gutters. We note the impressive restoration work to the stable/chapel building and thank all involved. The CCC states the following regarding the future of the Mountbatten Group. • During consultation regarding the approval process for the ventilation shaft (known as VS6) located beside the Mountbatten Group of buildings, South32 (ICHPL) indicated their intent to restore and renovate the main buildings to utilise as office space. • Pre-approval for VS6, South32 (ICHPL) indicated to the community that once mining was completed the Mountbatten Group and immediate land would be gifted to the local community. This intention was a significant reason the VS6 project was not strongly opposed by the local community. • The CCC requests South32 (ICHPL) formally indicates its intention to renovate and gift the Mountbatten Group asset to the community in the lead up to the cessation of mining operations in the area.	Works have been undertaken on the Mountbatten House to enable stabilisation works to be undertaken, including remedial works to framing timbers in the roof. The cottage, awning/extension was demolished as it was dilapidated and of no heritage value. Garden maintenance, minor repairs and pest inspections have been undertaken. Remedial works have focussed on the Stable and these works have been completed. Noted. Following an internal review, it was determined that upgrading the house to the applicable standards for office use was not feasible. While the future use of the house and land was discussed previously, we will incorporate these options into our future mine closure planning. The community and CCC will be actively consulted throughout this process to ensure their input is included in the final decisions.
Camden City Council	
<u>Response received 10 July 2024</u> I refer to the above matter and wish to advise that Camden Council will not be providing any comments in relation to this matter at this time.	Noted
Mundawari Heritage Consultants	
<u>Response received 22 July 2024</u> Upon review of the AMHMP we provide the following feedback. 9.3 Discovery of Unanticipated Aboriginal Cultural Material - Discovery: Should unanticipated Aboriginal cultural material be identified during any surface works, works will cease in the vicinity of the find.	Text in Section 9.3 has been amended to address feedback.

An exclusion zone and temporary fence of 10 metres should be established around the cultural material whilst the Raps are consulted for appropriate action.	
9.4 Discovery of Unanticipated Human Remains - Discovery: If suspected human remains are discovered all activity in the vicinity of the human remains must stop to ensure minimal/no additional damage is caused to the remains. The remains must be left in place and protected from harm or damage. The area containing the suspected human skeletal remains should be fenced off and isolated from access. Any soils excavated from the location of the burial (including all soils that have been recently removed from the works site) should be immediately identified, recovered (if removed from site) and stored adjacent to the potential burial.	Text in Section 9.4 has been amended to address feedback.
Cultural Heritage Awareness Training - Induction Endeavour Coal, in consultation with the Raps, should develop Cultural Heritage Awareness Training (Induction) to all site personnel and contractors who work at Appin Mine. This training should form part of the site induction process. The training package should include (but is not limited to) the following: # An overview of Aboriginal cultural heritage values of the local area; # Procedures for stopping work and consulting with the appropriate project/environmental manager for cases detailed in Section 9; # Information related to the relevant legislation for the protection of Aboriginal sites (offences under Section 86 NPW Act, 1974) and penalties for knowingly or unknowingly disturbing and/or destroying an Aboriginal site. # Every employee and contractor should sign a Declaration regarding the induction training prior to commencing work at the site.	Reference to Cultural Heritage Awareness Training included in Section 2.
Kamilaroi-Yankuntjatjara Working Group	
<u>Response received 29 July 2024</u> We have no further comments to add.	Noted.
Gali Heritage Consultants	
<u>Response received 1 August 2024</u> I have no feedback and I agree with the plan.	Noted.
Guntawang Aboriginal Resources Incorporated	
<u>Response received 6 August 2024</u> Support findings and recommendations.	Noted.
NTSCORP	
<u>Response received 19 August 2024</u>	Noted.

I can confirm that NTSCORP has not received any comments in relation to the Appin Mine Heritage Management Plan.	
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Appendix 4: Consultation with RAPs

RAP	Year Contacted	Method of Contact	Response received?
A1 Indigenous Services	2024	Email	No
Amanda Hickey Cultural Services	2024	Email	No
Aragung Aboriginal Cultural Heritage Site Assessments	2024	Email	No
B.H. Heritage Consultants	2024	Email	No
Bariyan Cultural Connections	2024	Email	No
Barking Owl Aboriginal Corporation	2024	Email	No
Barraby Cultural Services	2024	Email	No
Bidjawong Aboriginal Corporation	2024	Email	No
Butucarbin Aboriginal Corporation	2024	Email	No
Clive Freeman	2024	Email	No
Corroboree Aboriginal Corporation	2024	Email	No
Cubbitch Barta	2024	Email	No
D'harawal Mens Aboriginal Corporation	2024	Email	No
Darug Boorooberongal Elders Aboriginal Corporation	2024	Email	No
Darug Land Observations	2024	Email	No
Dharug Ngurra Aboriginal Corporation	2024	Email	No
Dharramalin	2024	Email	No
Didge Ngunawal Clan	2024	Email	No
Gali Heritage Consultants	2024	Email	Yes
Galamaay Cultural Consultants (GCC)	2024	Email	No
Garrara Aboriginal Corporation	2024	Email	No
Gilay Consultants	2024	Email	No
Ginninderra Aboriginal Corporation	2024	Email	No
Goodradigbee Cultural & Heritage Aboriginal Corporation	2024	Email	No
Guntawang Aboriginal Resources Incorporated	2024	Email	Yes
James Davis	2024	Email	No
Kamilaroi Yankuntjatjara Working Group	2024	Email	Yes
Konanggo Aboriginal Cultural Heritage Services	2024	Email	No
Mundawari Heritage Consultants	2024	Email	Yes
Mura Indigenous Corporation (icn:8991)	2024	Email	No
Murra Bidgee Mullangari Aboriginal Corporation	2024	Email	No
Nattai Aboriginal Culture & Heritage Consultation Service	2024	Email	No
Ngambaa Cultural Connections	2024	Email	No
On Country Living	2024	Email	No

Teena Riley	2024	Email	No
Tharawal Local Aboriginal Land Council	2024	Email	No
Thawun Aboriginal Consultancy	2024	Email	No
Thomas Dahlstrom	2024	Email	No
Thoorga Nura	2024	Email	No
Timothy Stubbs	2024	Email	No
RAW Cultural Healing	2024	Email	No
Waawaar Awaa Aboriginal Corporation	2024	Email	No
Wallanbah Aboriginal Site Conveyancing	2024	Email	No
Wori Woilywa	2024	Email	No
Wurrumay Pty Ltd	2024	Email	No
Yulay Cultural Services	2024	Email	No
Yurrandaali	2024	Email	No
South Coast People Native Title Claimant	2024	Email	No
Woronora Plateau Gundungara Elders Council	2024	Email	No

Appendix 5: Aboriginal Sites located in the BSO Project Area⁸

Site Code	AHIMS Site ID	Site Type	Scientific Significance	Inspected
62; 796	52-2-0062; 52-2-0796	Sandstone Platform with Grinding Groove / Engraving	High	Yes
239; 334; 365	52-2-0239; 52-2-0334; 52-2-0365	Sandstone Platform with Grinding Groove / Engraving	Moderate	Yes ²
282; 982	52-2-0282; 52-2-0982	Sandstone Platform with Grinding Groove / Engraving	High	Yes ¹
312; 784	52-2-0312; 52-2-0784	Sandstone Platform with Grinding Groove / Engraving	High	Yes ¹
313; 790	52-2-0313; 52-2-0790	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Moderate	Attempted
314; 785	52-2-0314; 52-2-785	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	High	Attempted
316; 788	52-2-0316; 52-2-0788	Sandstone Platform with Grinding Groove / Engraving	Low	Attempted
351; 794	52-2-0351; 52-2-0794	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Moderate	Yes ¹
362; 567	52-2-0362; 52-2-0567	Sandstone Platform with Grinding Groove / Engraving	High	Attempted
441; 1382	52-2-0441; 52-2-1382	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
1122; 1129	52-2-1122; 52-2-1129	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
2074; 2075; 2092	52-2-2074; 52-2-2075; 52-2-2092	Sandstone Shelter with Deposit only	Moderate	Yes ¹
2786	52-2-2786	Scarred Tree	N/A*	No
2789	52-2-2789	Potential Archaeological Deposit	PAD	No
2797	52-2-2797	Scarred Tree	N/A*	No
2800	52-2-2800	Potential Archaeological Deposit	PAD	No
2819	52-2-2819	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	No
2820	52-2-2820	Potential Archaeological Deposit	PAD	No
2821	52-2-2821	Potential Archaeological Deposit	PAD	No

⁸ Excludes sites covered in the EA that were outside of the Preferred Project Report area.

Site Code	AHIMS Site ID	Site Type	Scientific Significance	Inspected
2822	52-2-2822	Potential Archaeological Deposit	PAD	No
2823	52-2-2823	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	No
2827	52-2-2827	Potential Archaeological Deposit	PAD	No
2830	52-2-2830	Potential Archaeological Deposit	PAD	No
2831	52-2-2831	Potential Archaeological Deposit	PAD	No
2832	52-2-2832	Potential Archaeological Deposit	PAD	No
2833	52-2-2833	Potential Archaeological Deposit	PAD	No
2834	52-2-2834	Potential Archaeological Deposit	PAD	No
2835	52-2-2835	Potential Archaeological Deposit	PAD	No
2836	52-2-2836	Potential Archaeological Deposit	PAD	No
2837	52-2-2837	Potential Archaeological Deposit	PAD	No
2839	52-2-2839	Potential Archaeological Deposit	PAD	No
2840	52-2-2840	Potential Archaeological Deposit	PAD	No
2841	52-2-2841	Potential Archaeological Deposit	PAD	No
2842	52-2-2842	Potential Archaeological Deposit	PAD	No
2843	52-2-2843	Potential Archaeological Deposit	PAD	No
2844	52-2-2844	Potential Archaeological Deposit	PAD	No
2845	52-2-2845	Potential Archaeological Deposit	PAD	No
2846	52-2-2846	Sandstone Shelter with Deposit only	Low	No
2847	52-2-2847	Potential Archaeological Deposit	PAD	No
2848	52-2-2848	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	No
2849	52-2-2849	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	No
2850	52-2-2850	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	No
2852	52-2-2852	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	No
2857	52-2-2857	Potential Archaeological Deposit	PAD	No
2859	52-2-2859	Potential Archaeological Deposit	PAD	No
2863	52-2-2863	Potential Archaeological Deposit	PAD	No
2865	52-2-2865	Potential Archaeological Deposit	PAD	No
2900	52-2-2900	Potential Archaeological Deposit	PAD	No
2902	52-2-2902	Potential Archaeological Deposit	PAD	No
2904	52-2-2904	Potential Archaeological Deposit	PAD	No
2951	52-2-2951	Potential Archaeological Deposit	PAD	No

Site Code	AHIMS Site ID	Site Type	Scientific Significance	Inspected
2952	52-2-2952	Potential Archaeological Deposit	PAD	No
2953	52-2-2953	Potential Archaeological Deposit	PAD	No
2954	52-2-2954	Potential Archaeological Deposit	PAD	No
2974	52-2-2974	Potential Archaeological Deposit	PAD	No
3073	52-2-3073	Sandstone Platform with Grinding Groove / Engraving	Low	No
3094	52-2-3094	Sandstone Platform with Grinding Groove / Engraving	Low	Attempted
3136	52-2-3136	Sandstone Platform with Grinding Groove / Engraving	Low	Attempted
3468	52-2-3468	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
3470	52-2-3470	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
3474	52-2-3474	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	No
52-3-0291	52-3-0291	Sandstone Platform with Grinding Groove / Engraving	Low	No
52-3-0293	52-3-0293	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	N/A*	No
52-3-0524	52-3-0524	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Moderate	Yes ²
BS 1	52-2-3683	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
BS 6	52-2-3686	Stone Artefact(s)	Low	Yes ¹
BS 9	52-2-3689	Stone Artefact(s)	Low	Yes ¹
BS 13	52-2-3693	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
BS 14	52-2-3694	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
BS 15	52-2-3695	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
BS 16	52-2-3696	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
BS 17	52-2-3697\	Stone Artefact(s)	Low	Yes ¹
BS 18	52-2-3698	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
BS 19	52-2-3699	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
BS 20	52-2-3700	Sandstone Shelter with Deposit only	Low	Yes ¹
BS 21	52-2-3701	Stone Artefact(s)	Low	Yes ¹

Site Code	AHIMS Site ID	Site Type	Scientific Significance	Inspected
BS 22	52-2-3702	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
BS 23	52-2-3703	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
BS 24	52-2-3704	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
BS 25	52-2-3705	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
BS 27	52-2-3707	Stone Artefact(s)	Low	Yes ¹
BS 28	52-2-3708	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
BS 29	52-2-3709	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
BS 30	52-2-3710	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
BS 31	52-2-3711	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
BS 32	52-2-3712	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
BS 33	52-2-3713	Sandstone Shelter with Deposit only	Low	Yes ¹
BS 34	52-2-3714	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Moderate	Yes ¹
BS 35	52-2-3715	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
BS 36	52-2-3716	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Moderate	Yes ¹
BS 37	52-2-3717	Sandstone Platform with Grinding Groove / Engraving	Low	Yes
BS 38	52-2-3718	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
BS 39	52-2-3719	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
BS 41	52-2-3721	Sandstone Platform with Grinding Groove / Engraving	Low	Yes ¹
BS 42	BS 42	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
BS 43	BS 43	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
BS 44	BS 44	Sandstone Shelter with Art / Grinding Groove / Engraving / Deposit	Low	Yes ¹
	52-2-3830	Sandstone Shelter with Art	Moderate	Yes ³

Site Code	AHIMS Site ID	Site Type	Scientific Significance	Inspected
Yes ¹	These Aboriginal sites were inspected as part of the BSO Aboriginal Cultural heritage Assessment (Biosis Research 2009).			
Yes ²	These Aboriginal sites were inspected as part of the West Cliff Area 5 Longwall 32 End of Panel assessment (Biosis Research 2008).			
Yes ³	These Aboriginal sites were inspected as part of the Appin Area 9 Revised heritage Impact Assessment for Longwalls 901 to 904 (Biosis Research 2012).			
Attempted – An attempt to inspect these sites was made, however the sites could not be found.				

Additional sites within the area as defined by Plan 3, not previously identified in the table above, are listed below.

Site ID	Site Name	Site Features	Recorders
52-2-3845	Morton Park Rd 5	Artefact : 20	Biosis Pty Ltd - Sydney
52-2-3842	Morton Park Rd 2	Artefact : 3	Biosis Pty Ltd - Sydney
52-2-3840	Brooks Point Rd 1	Artefact : 5	Biosis Pty Ltd - Sydney, M Thompson
52-2-3674	Mountbatten 1	Artefact : 1	
52-2-3841	Morton Park Rd 1	Artefact : 8	
52-2-3843	Morton Park Rd 3	Artefact : 22	
52-2-3844	Morton Park Rd 4	Artefact : 1	
52-2-3846	Mountbatten 2	Artefact : 1	
52-2-3686	Bulli Site 6	Artefact : 1	
52-2-4937	Appin Road P4P PAD 02	Potential Archaeological Deposit (PAD)	Artefact Heritage and Environment - Pyrmont, Miss. Lily (artefact) Hackett
52-2-4370	Stokes Creek 129	Art (Pigment or Engraved)	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4348	Four Mile Creek 20	Art (Pigment or Engraved)	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4379	Stokes Creek 122	Art (Pigment or Engraved)	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4485	UPPER GEORGES RIVER 17	Grinding Groove	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4938	Appin Road P4P PAD 04	Potential Archaeological Deposit (PAD)	Artefact Heritage and Environment - Pyrmont, Miss. Lily (artefact) Hackett
52-2-4940	Appin Road P4P PAD 01	Potential Archaeological Deposit (PAD)	Artefact Heritage and Environment - Pyrmont, Miss. Lily (artefact) Hackett
52-2-4349	Four Mile Creek 19	Art (Pigment or Engraved)	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4382	Stokes Creek 127	Art (Pigment or Engraved)	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4936	Appin Road P4P PAD 05	Potential Archaeological Deposit (PAD)	Artefact Heritage and Environment - Pyrmont, Miss. Lily (artefact) Hackett
52-2-4383	Stokes Creek 128	Art (Pigment or Engraved)	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4939	Appin Road P4P PAD 03	Potential Archaeological Deposit (PAD)	Artefact Heritage and Environment - Pyrmont, Miss. Lily (artefact) Hackett
52-2-4604	APPIN FALLS 16	Grinding Groove	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4943	Mallaty Creek AFT 1	Artefact	Urbis Pty Ltd - Angel Place L8 123 Pitt Street, Mr. Owen Barrett
52-2-4722	WA-06	Artefact	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4942	Ousedale Creek AFT and PAD	Artefact, Potential Archaeological Deposit (PAD)	Urbis Pty Ltd - Angel Place L8 123 Pitt Street, Mr. Owen Barrett

52-2-4945	345 Appin Road AFT 1	Artefact	Urbis Pty Ltd - Angel Place L8 123 Pitt Street, Mr. Owen Barrett
52-2-4944	Ousedale Creek PAD	Potential Archaeological Deposit (PAD)	Urbis Pty Ltd - Angel Place L8 123 Pitt Street, Mr. Owen Barrett
52-2-4870	Menangle Artefact 1	Artefact, Potential Archaeological Deposit (PAD)	Artefact Heritage and Environment - Pyrmont, Miss. Emma Jones (artefact)
52-2-4946	345 Appin Road AFT 2	Artefact	Urbis Pty Ltd - Angel Place L8 123 Pitt Street, Mr. Owen Barrett
52-2-4450	RAPHAEL 10	Art (Pigment or Engraved), Artefact	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4451	RAPHAEL 12	Art (Pigment or Engraved)	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4449	RAPHAEL 09	Artefact	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4725	WA-16	Artefact	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4736	PAD-WA6	Potential Archaeological Deposit (PAD)	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4603	APPIN FALLS 17	Art (Pigment or Engraved)	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4446	OUSEDALE CREEK 06	Art (Pigment or Engraved), Artefact	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4727	WA-13	Modified Tree (Carved or Scarred)	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4728	WA-12	Modified Tree (Carved or Scarred)	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4733	PAD-WA3	Potential Archaeological Deposit (PAD)	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4665	MAC_IF	Artefact	Niche Environment and Heritage, Miss. Chelsea Freeman
52-2-4445	OUSEDALE CREEK 07	Art (Pigment or Engraved)	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4723	WA-08	Artefact	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4735	PAD-WA5	Potential Archaeological Deposit (PAD)	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4558	Broughton Pass Rock Shelter	Stone Quarry : 1	Ms. Tory Stening, Unearthed Archaeology & Heritage
52-2-4447	OUSEDALE CREEK 05	Art (Pigment or Engraved), Artefact	Illawarra Prehistory Group, Mr. Bruce Howell
52-2-4729	WA-11	Artefact	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4732	PAD-WA2	Potential Archaeological Deposit (PAD)	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4737	PAD-WA7	Potential Archaeological Deposit (PAD)	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4724	WA-09	Artefact	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4726	WA-14	Artefact	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4731	PAD-WA1	Potential Archaeological Deposit (PAD)	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4734	PAD-WA4	Potential Archaeological Deposit (PAD)	Niche Environment and Heritage, Mr. Riley Finnerty

52-2-4720	WA-04	Artefact	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4730	WA-10 - Not a site	Modified Tree (Carved or Scarred)	Navin Officer Heritage Consultants Pty Ltd, Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4721	WA-03	Artefact	Niche Environment and Heritage, Mr. Riley Finnerty
52-2-4226	DR-AS-01	Artefact	
52-2-4227	DR-AS-02	Artefact	
52-2-4567	Harris Creek Scar Tree	Modified Tree (Carved or Scarred)	
52-2-4568	Harris Creek Scar Tree 2	Modified Tree (Carved or Scarred)	
52-2-4569	Harris Creek 2	Artefact	
52-2-4570	Harris Creek 4	Artefact	
52-2-4630	Hawkey Road ISO1	Artefact	
52-2-4369	Wedderburn Road 5	Grinding Groove	
52-2-4376	Stokes Creek 124	Art (Pigment or Engraved)	
52-2-4484	Sawpit Gully 2	Grinding Groove	
52-2-1368	Brennans Creek 2	Art (Pigment or Engraved)	Mrs. Caryll Sefton
52-2-3508	West Cliff 5	Artefact : 2	Biosis Pty Ltd - Sydney
52-2-3617	Dendrobium 10	Potential Archaeological Deposit (PAD)	Biosis Pty Ltd - Sydney
52-2-1373	Brennans Creek 7	Art (Pigment or Engraved)	Biosis Pty Ltd - Wollongong, Mrs. Caryll Sefton
52-2-3506	West Cliff 3	Art (Pigment or Engraved) : 1	Biosis Pty Ltd - Sydney
52-2-3507	West Cliff 4	Art (Pigment or Engraved) : 1	Biosis Pty Ltd - Sydney
52-2-3504	West Cliff 1	Art (Pigment or Engraved) : 1, Artefact : 6	Biosis Pty Ltd - Sydney
52-2-1371	Brennans Creek 5	Grinding Groove	Biosis Pty Ltd - Wollongong, Mrs. Caryll Sefton
52-2-1372	Brennans Creek 6	Art (Pigment or Engraved)	Mrs. Caryll Sefton
52-2-3616	Dendrobium 11 duplicate of 52-2-3533	Potential Archaeological Deposit (PAD) : 1	Mr. Jamie Reeves
52-2-3505	West Cliff 2	Art (Pigment or Deposit (PAD) : 1 Engraved) : 1, Potential Archaeological	Biosis Pty Ltd - Sydney

Appendix 6: Non-Aboriginal Sites located in the BSO Project Area

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
Menangle				
1	Menangle Rail Bridge and Viaduct, Nepean River, Menangle.	State Heritage Register Listing No. 01047. SHI DB No.5012102 Menangle Viaduct, Wollondilly LEP. SHI DB No. 2690059. Wollondilly Heritage Study. Menangle Underbridge, S.170 State Agency heritage Register, State Rail Authority. SHI DB No. 4440315, 4440500. Register of the national Estate No. 3284.	E 291900 N 6222450	1863, first large iron bridge in NSW and rare type, oldest bridge on rail system, of landscape value and historical association with economic development of southern part of colony. State and National significance
2	Menangle Weir, Nepean River, Menangle.	Sydney REP No. 20 – Hawkesbury-Nepean River. SHI DB No. 3032.	E291850 N6222420	Significant locally as an intact example of a simple weir structure for agricultural purposes, built in response to Upper Nepean water Scheme taking water from the river upstream in 1886.
3	Menangle Railway station Group, Station Street, Menangle.	State Heritage register No. 01191. SHI DB No.5012101. State Rail Authority section 170 Register, 4440267. Wollondilly LEP. SHI DB No. 2690060 ('Railway Station'). Wollondilly Heritage Study. WO0060.	E291980 N6221610	One of the earliest station complexes to survive in the state, and of important design. State and national significance in conjunction with Menangle rail bridge
4	Menangle Store 57 Menangle	Wollondilly LEP. SHI DB No. 2690090. Wollondilly Heritage Study.	E291480 N6221400	Local historical significance as the only 20th century store in Menangle Village, serving local farmers and the Camden Park Estate. Unusual in the state as an unusual example

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
	Street, Menangle.			of a "Federation arts & Crafts" style shop. Aesthetic significance as landmark in Menangle.
5	Elizabeth Macarthur Agricultural Institute (formerly Camden park Estate) [part] Woodbridge Road, Elizabeth Macarthur Avenue, Menangle.	State Heritage Register no. 00341. SHI DB no. 5045133 (Camden Park). State heritage Register No. 01697. SHI DB No. 5051536 (Camden Park Estate and Belgenny Farm). Wollondilly LEP. SHI DB No. 2690002 (Elizabeth Macarthur Agricultural Institute). Wollondilly Heritage Study. S.170 State Agency heritage Register (Dept of Agriculture). Sydney REP no. 20 –Hawkesbury-Nepean River. Register of the National Estate No. 3249	E289400 N6222500	State and national social, historic, scientific and aesthetic significance. The oldest surviving sheep stud in Australia. Only parts of the place are in the Project Area.
6	Menangle Gate Lodge (Camden Park) 46 Woodbridge Road, Menangle.	State heritage Register No. 2690098 (part of Camden Park Estate). Wollondilly LEP. SHI DB No. 3040024, 2690098. Wollondilly Heritage Study. S.170 State Agency Heritage Register (Dept of Agriculture).	E290650 N6221710	Local and regional historical significance as one of the pair of gate lodges built for the Camden Park Estate. Aesthetic significance as an attractive and largely intact example of an "Arts and Crafts" style estate cottage in an attractive rural setting
7	Dairy No. 4 (Camden Park)	State Heritage Register No. 00341. SHI DB No. 5045133 (Camden Park).	E290200 N6221820	Locally historically significant in illustrating the changing nature of dairying activities on the Camden Park Estate in the late 19th and early 20 th centuries. A landmark feature of aesthetic value.

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
	EMAI Woodbridge Road, Menangle.	State Heritage Register No. 01697. SHI DB No. 5051536 (Camden Park Estate and Belgenny Farm). Wollondilly LEP. SHI DB No. 2690002 (Elizabeth Macarthur Agricultural Institute) 3040025 (Dairy No. 4). Wollondilly Heritage Study. S.170 State Agency Heritage Register (Dept of Agriculture). Sydney REP No. 20 – Hawkesbury-Nepean River. Register of the National Estate No. 3249.		
8	Camden Park Estate Central Creamery Station Street, Menangle.	Wollondilly LEP, SHI DB No. 2690294 and 2690729. Wollondilly Heritage Study.	E291960 N6221710	Regionally significant as evidence of the scale of dairying activities carried out to supply Sydney's needs in the latter part of the 19th century and in the 20th century, and for its associations with the Camden Park Estate.
9	Camden Park Rotolactor Station Street, Menangle.	Wollondilly LEP. SHI DB No. 2690295. Wollondilly Heritage Study.	E291910 N6221710	State historical significance as evidence of the post-WWII mechanised phase of dairying activity in the Sydney Region, being the second facility of this type and scale in the world.
10	St James Anglican Church	Wollondilly LEP, SHI DB No. 2690091. Register of the National Estate No. 3301.	E291630 N6221200	Significant in the State as an unusual and particularly fine example of a small country church of great architectural integrity and quality. Historical associations with the Macarthur family, and of local landscape significance.

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
	131 Menangle Road, Menangle.			
11	St Patricks Catholic Church. 131 Menangle Road, Menangle.	Wollondilly LEP. SHI DB No. 2690097. Wollondilly Heritage Study.	E291490 N6221320	Local social and historic significance through its association with the Roman Catholic community in the Menangle area since 1895, and aesthetic contribution to Menangle landscape.
12	Gilbulla (Anglican Conference Centre) 710 Morton Park, Road Menangle.	Wollondilly LEP. SHI DB No. 2690092. Wollondilly Heritage Study.	E292100 N6220160	Locally and regionally significant for its associations with the Macarthur family and as an outstanding example of a Federation Arts and Crafts residence on a grand scale.
13	Bungalow 92 Menangle Road, Menangle.	Draft revision of Wollondilly LEP, 2009. SHI DB No. 2690727.	Centred around E291480 N6221400	Local significance architecturally and as part of the important early 20th century building stock making up Menangle's cultural landscape.
14	Bungalow 151 Menangle Road, Menangle	Draft revision of Wollondilly LEP, 2009. SHI DB No. 2690726	Centred around E291480 N6221400	Local significance architecturally and as part of the important early 20th century building stock making up Menangle's cultural landscape
15	Bungalow 106 Menangle Road, Menangle	Draft revision of Wollondilly LEP, 2009. SHI DB No. 2690722	Centred around E291480 N6221400	Local significance architecturally and as part of the important early 20th century building stock making up Menangle's cultural landscape

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
16	Bungalow 96 Menangle Road, Menangle	Draft revision of Wollondilly LEP 2009, SHI DB No. 2690728	Centred around E291480 N6221400	Local significance architecturally and as part of the important early 20th century building stock making up Menangle's cultural landscape
17	Cottage 124 Menangle Road, Menangle	Draft revision of Wollondilly LEP, 2009. SHI DB No. 2690723	Centred around E291480 N6221400	Local significance architecturally and as part of the important early 20th century building stock making up Menangle's cultural landscape
18	Cottage 102 Menangle Road, Menangle	Draft revision of Wollondilly LEP, 2009. SHI DB No. 2690721.	Centred around E291480 N6221400	Local significance architecturally and as part of the important early 20th century building stock making up Menangle's cultural landscape
19	Cottage 138 Menangle Road, Menangle	Draft revision of Wollondilly LEP, 2009. SHI DB No. 2690725.	Centred around E291480 N6221400	Regional significance for its association with the Elizabeth Macarthur Institute and the former Camden park estate dairies and as an important component of the historic cultural landscape of Menangle and Camden
20	Cottage 128 Menangle Road, Menangle	Draft revision of Wollondilly LEP, 2009. SHI DB No. 2690724.	Centred around E291480 N6221400	Local significance architecturally and as part of the important late 19th century building stock making up Menangle's cultural landscape.
21	Dairy Cottage 2 Station Street, Menangle	Draft revision of Wollondilly LEP, 2009. SHI DB No. 2690730	E291980 N6221340	Local significance for associations with the Camden Park Estate Central Creamery, as evidence of purpose-built worker's housing associated with the Creamery, and an important component of the historic cultural landscape of Menangle

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
22	Dairy Cottage 65 Woodbridge Road, Menangle	Draft revision of Wollondilly LEP, 2009. SHI DB No. 2690731.	E290830 N6221450	Local significance for associations with the Camden Park Estate Central Creamery, as evidence of purpose-built worker's housing associated with the Creamery, and an important component of the historic cultural landscape of Menangle
23	EMI Cottage 29 50 Menangle Road, Menangle	Draft revision of Wollondilly LEP, 2009. SHI DB No. 2690719	Centred around E291480 N6221400	Regional significance for its association with the Elizabeth Macarthur Institute and the former Camden Park Estate dairies and as an important component of the historic cultural landscape of Menangle and Camden
24	House 100 Menangle Road, Menangle	Draft revision of Wollondilly LEP, 2009. SHI DB No. 2690725.	Centred around E291480 N6221400	Local significance architecturally and as part of the important late 19th century building stock making up Menangle's cultural landscape.
25	Menangle Conservation Area Menangle Road Menangle (includes items 4, 10, 11, 13-20, 23 and 24)	Draft revision of Wollondilly LEP, 2009. SHI DB No. 269027	Centred around E291480 N6221400	State significance as an unusually intact example of a rural service centre of this period and in particular, one that is associated with the dairying industry; has local and regional aesthetic significance as a cultural landscape entity. Historical associations with the Macarthur family and the Camden Park Estate.
26	Slab Hut 40 Carrolls Road, Menangle.	Draft revision of Wollondilly LEP, 2009. SHI DB No. 2690718.	E289030 N6219520	Local significance as a remnant of the early settlement and as a locally rare example of the slab hut.

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
27	The Pines Menangle Road, Menangle Park.	Not heritage listed, but see Proudfoot, H. 1977. Colonial Buildings: Macarthur growth Centre. Macarthur Development Board (page 51).	E291890 N6223070	Locally significant as a very good, late example of the classical Colonial stone house.
Douglas Park				
28	Mountbatten Group (formerly Morton Park) 655 Menangle Street, (off Duggan Street) Douglas Park.	Wollondilly LEP. SHI DB No, 2690085, 2690086, 2690087 and 2690088. Wollondilly Heritage Study,	E289860 N6215600	Regionally significant because of its historical associations with the early settlement of the Douglas Park area; its aesthetic significance as a collection of important architecture and as a landmark.
29	St Mary's Towers (formerly Parkhall) 415 Douglas Road, Mt Kiewa Road, Douglas Park.	Wollondilly LEP. SHI DB No. 2690278 and 2690089. Wollondilly Heritage Study. Register of the National Estate No. 3305.	E289060 N6212420	State significance through associations with the early settlement and Sir Thomas Mitchell; aesthetically significant architecture.
30	Railway Cottage	Draft revision of Wollondilly LEP 2009. SHI DB No. 2690714.	E289050 N6215150	Local significance as the only surviving example of a residence associated with the construction of the southern rail line in Douglas Park.

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
	3 Camden Road, Douglas Park.			
31	Warrangunyah 670 Menangle Road, Douglas Park.	Draft revision of Wollondilly LEP 2009. SHI DB No. 2690716.	E289320 N6216950	Local and regional significance as an outstanding example of a late Victorian period gentleman's country homestead
Wilton				
32	Wilton Park (Wilton Park Stables) Wilton Park road, Maldon.	State heritage Register Listing No. 00257. SHI DB No. 5045546. Wollondilly LEP. SHI DB No. SHI DB No 2690190. Wollondilly heritage Study 1992. Register of the National Estate No. 3304	E282560 N6211650	State historical significance as Samuel Hordern's thoroughbred horse stud, with fine ensemble of the rural architecture with aesthetic significance
33	Cottage 180 Wilton Park Road, Wilton	Draft revision of Wollondilly LEP 2009. SHI DB No. 2690791	E283140 N6210460	Local significance as a particularly good example of a 19th century pastoral cottage
34	Kedron 305 Wilton Park Road, Wilton	Draft revision of Wollondilly LEP 2009 SHI DB No. 2690797	E282380 N6211050	Regional significance as an exceptional example of a federation period homestead
35	Nepean Tunnel and above ground structures	State heritage Register no. 01373 (as 'Upper Canal System [Prospect Reservoir]'). SHI DB No. 5045546. Wollondilly LEP. SHI DB No. No. 2690008. S.170 State Agency	E288150 N6209160 To E290500 N6209790	State historical significance as part of Sydney's water scheme of the 1880s and an excellent example of 19th century hydraulic engineering, including tunnels and the use of gravity to feed water along the canal

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
		Heritage Register. Wollondilly Heritage Study		
36	Broughtons Pass Weir Wilton Road, Wilton	State Heritage Register No. 01373 (as 'Upper Canal System [Prospect Reservoir]'). SHI DB No. 5051481. S.170 State Agency Heritage Register. Wollondilly LEP. SHI DB No. 2690008. Wollondilly Heritage Study	E292016 N6210280	State historical significance as part of Sydney's water scheme of the 1880s and an excellent example of 19th century hydraulic engineering, including the use of gravity to feed water along the canal
37	Stone Ruin 45 Whitticase Lane, Douglas Park	Draft revision of Wollondilly LEP 2009. SHI DB No. 2690717. Wollondilly heritage Study Review	E291030 N62102100	Locally significant as a stone ruin historically associated with Sir Thomas Mitchell's tenant farmers
Appin				
38	Upper Nepean water Supply System Canal	State Heritage Register No. 01373 (as 'Upper Canal System [Prospect Reservoir]'). SHI DB No. 5051481. S.170 State Agency Heritage Register. Wollondilly LEP. SHI DB No. 2690008. Wollondilly Heritage Study	E292980 N6215010 To E293340 N6217090	State historical significance as part of Sydney's water scheme of the 1880s and an excellent example of the 19th century hydraulic engineering, including the use of gravity to feed water along the canal
39	Hume and Hovell Monument Appin Road, Appin	Campbelltown Local Environmental Plan 2015 Local Heritage Item I56 and State Heritage Inventory Heritage Item ID 1291232	E296510 N6218720	A monument of local significance marking the homestead of Hamilton Hume and the starting point of Hume and Hovell's exploratory trip to Port Phillip
40	Beulah Appin Road, Appin	State heritage Register No. 00368. Campbelltown LEP. SHI DB No. 5045426.	E294790 N6219820	State significance as an entire cultural landscape containing early colonial structures – homestead group and stone bridge – remnant 19th century farm and garden layout, an

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
				octagonal pavilion or summer house as a major focal element and a remnant spotted gum (<i>Corymbia maculata</i>) forest as a result of early conservation planning. NSW Chief Scientist recommendations include the implementation of koala corridor B through the site. ‘Meadowvale’ has a visual relationship with Beulah’s octagonal pavilion and contributes to the significance of the cultural landscape.
41	Cataract Dam Cataract river, Appin	State heritage Register no. 01359. SHI DB No. 5051469. S.170 State Agency heritage Register. Wollondilly LEP. SHI DB No. 2690211. Wollondilly heritage Study.	E297750 N6206190	State significance for its unusual design and construction, historical place in water schemes in Australia, and landmark values.
42	Appin Massacre Cultural Landscape	State Heritage Register No. 02067 Listing Number 02067	Central location E292254 N6211768	The Appin Massacre Cultural Landscape is of State heritage significance for its historic, associative, aesthetic, social, research, rarity, and representative values. For the purposes of this SHR listing, which is a negotiated outcome, the larger landscape is represented as a series of five non-contiguous places that are key locations significant to the Appin Massacre, its two-year lead up and aftermath: - Area 1: 1816 Appin Massacre Sorry Place; - Area 2: 1814 Rocky Ponds Creek Burial (Mount Britain) Sorry Place; - Area 3: Teston Farm (homestead complex and setting) and Lachlan Vale (homestead complex archeological site and setting) Shared Histories Place; - Area 4: Dharawal and Gundungurra Cultural Route, including the Hanging Trees (McGees Hill) Sorry Place, Ridgeline Camping Place and Vantage Point Teaching Place. - Area 5: Dharawal and Gundungurra Cultural Route, Corridor to Gathering Place. These key locations and their physical and visual interconnections are integral to an understanding of the Appin Massacre story. The Appin Massacre Cultural Landscape has State significant historic values for its tangible connections with the historical accounts, shared histories and movements related to the 17 April 1816 massacre of Dharawal and Gundungurra peoples by the

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
				British military at the command of Governor Macquarie (Area 1). It is also associated with the 1814 murders (Areas 2-3) in the two-year lead up to the massacre, and in the aftermath, the hanging and mutilation of First Nations resistance warriors (Area 4), as well as the 4 May 1816 Proclamation by Governor Macquarie (Areas 1-5). The Appin Massacre Cultural Landscape also has State significant historic values as a landscape representative of the complex relationships between First Nations people and settlers on the colonial frontier (Areas 2-3). The Appin Massacre is of State heritage significance for its historical importance as one of the most devastating massacre events of First Nations people in the history of NSW (Area 1). The massacre, which was conducted by the military as part of a broad campaign ordered by Governor Macquarie, was one of the few officially sanctioned massacres conducted by the NSW Colonial Government. Due to the direct involvement of Governor Macquarie, it is one of the most documented massacres in Australian history. The movements and actions expressed in the narrative about the massacre, its two-year lead up and aftermath, derived from the historic accounts, remain legible across the landscape. The massacre also has State significant historic values as an event that led to the 4 May 1816 Proclamation by Government Macquarie and changes to colonial law and regulations. These changes permitted bureaucratic intervention into First Nations people's lives, and the long-term devastating effects of their implementation. The proclamation signalled historic changes to the treatment of First Nations people and their traditional way of life by the Colonial Government. It was also a precedent in the subsequent history of Australian Frontier Wars and massacres. This edict 'permitted' future responses to resistance conflict and convinced colonists that they had the right to murder First Nations people who resisted the invasion of their Country. The Appin Massacre Cultural Landscape (Areas 1-4) has State significant associative and social values for its high importance to the Dharawal and Gundungurra people as the site of the brutal murder of their ancestors and their dispossession and displacement from Country. For the Dharawal and Gundungurra this landscape is a place of 'trauma, great sorrow, and death' (Dharawal and Gundungurra Family Groups 2021). The Appin Massacre Cultural Landscape has State significant associative and social values as a sacred place to the Dharawal, Gundungarra and Dharug people (Areas 1-5).

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
				This landscape, encompassing Cataract Gorge (Carrung-gurring), the Cataract River, and its tributaries, has special significance to the Dharawal, its traditional custodians, and extends respect to the Gundungurra and Dharug people, who also have obligations for this Country. Their connection to this land remains strong and was never broken. The Appin Massacre Cultural Landscape has State significant associative values for its strong connection with Governor Lachlan Macquarie (1762-1824) who ordered the military campaign that led to the massacre and was directly involved in its lead up and aftermath. The archaeological site of Lachlan Vale (Area 3) has State significant associative values for its strong connection with its owner William Broughton (1768-1821), a long-standing public servant to the colony. The topography of the Appin Massacre Cultural Landscape and its key locations have State significant First Nations aesthetic values as it provides natural pathways facilitating traditional practice. Key high points allow for important viewsheds across and within the natural amphitheatre of the Rocky Ponds Creek valley and beyond it to adjacent landscapes. Its spatial relationship in the broader regional cultural landscape further emphasises its connection to camping and gathering places, and the lands of other First Nations people via the identified Dharawal and Gundungurra Cultural Route (Areas 4-5). The Appin Massacre Cultural Landscape has research potential at a State level in relation to three different areas of study. It can likely provide, through archaeological and anthropological research of Areas 1-5, information on the ancient history of the Dharawal people and their connection to this land. Through historical and archaeological research of Areas 1-4, it can likely shed further light on the specific events of the Appin Massacre, its two year lead up and aftermath and provide us with a fuller understanding of this massacre. Through the historical and archaeological investigation of any archaeological sites at the Lachlan Vale or Teston Farm homestead complexes (Area 2) it could forward our collective knowledge of the everyday lives of colonists during the early nineteenth century. Any archaeological sites in these locations could also provide a greater understanding of how First Nations people interacted with colonists during this period. The Appin Massacre, as expressed through its cultural landscape, has State significant rarity values within the context of colonial frontier massacres conducted between the

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
				1790s and turn of the twentieth century in NSW. Within this context, the Appin Massacre is an early known massacre that was government sanctioned, perpetrated by the military, and is recorded through substantial historical documents. It is the largest known massacre to have occurred in the Sydney region. It is also rare for its direct association with the 4 May 1816 Proclamation by Governor Macquarie. The edict was a turning point in the colonial government's treatment of First Nations people due to its comprehensive and far-reaching policies which were designed to disrupt traditional ways of life. The Appin Massacre Cultural Landscape has State heritage significance as a representative example of a landscape of colonial frontier violence. The Appin Massacre, as expressed through its cultural landscape, is also a representative example of a colonial frontier massacre within NSW. Today, places such as the Appin Massacre Cultural Landscape serve to remind Australia of its history of mistreatment of the traditional owners of this country. These places reclaim First Nations history from the colonial story and ensure that the atrocities of colonial Australia do not fade from the national memory.
Razorback				
43	Wooden milepost Razorback Road and Remembrance Drive Junction, Razorback	Wollondilly LEP. SHI DB No. 2690158. Wollondilly Heritage Study.	E284100 N6218300	Locally and regionally significant as a now rare road marker of the original Great South Road.
44	Homestead ruins and trees 40 Mount Hercules Road, razorback.	Draft revision of Wollondilly LEP 2009. SHI DB No. 2690880	E285280 N6219080	Locally of scientific significance as an undisturbed archaeological site of a 19th century rural residence.

Item #	Item Name and Address	Heritage Register	Map Coordinates (MGA)	Summary of Heritage Significance
45	Razorback Inn Remembrance Way, Picton.	Wollondilly LEP. SHI DB No. 2690150. Wollondilly Heritage Study 1992.	E282030 N6217200	Local significance in providing evidence of the nature of early settlement in the area and the importance of the early road link to the south, associations with early convict settlers and the prominent Antill family, and as a typical building of its type.
46	Berkeley Lodge 1545 remembrance Way, Picton.	Draft revision of Wollondilly LEP 2009. SHI DB No. 2690348.	E282180 N6217199	Example of an extended and well-maintained 19th century homestead of local significance.
Maldon				
47	Maldon Cement Works Maldon Bridge Road, Maldon.	Draft revision of Wollondilly LEP 2009. SHI DB No. 2690142	E282000 N6213700	Regionally historical significant as evidence of the growth of the Sydney urban area and its influence on the growth of the Wollondilly area, and as an example of post WWII industrial operations on a large scale.
48	Maldon suspension bridge Wilton Park Road, Maldon	Wollondilly LEP. SHI DB No. 2690196. Wollondilly heritage Study 1992.	E281860 N6212910	Regionally significant as an example of an unusual bridge design
Old Bulli Shafts				
49	Bulli No.1 Shaft	Wollongong LEP and Illawarra REP. SHI DB No. 19139	E302760 N6200660	Regionally significant as archaeological evidence
50	Bulli No. 2 Shaft	Wollongong LEP and Illawarra REP. SHI DB No. 2700804. Wollongong Heritage Study	E303489 N6200589	Regionally significant as archaeological evidence

Appendix 7: Aboriginal Heritage Management – AMVA Project

An Aboriginal Cultural Heritage Management Plan (dated May 2022)⁹ was developed for managing Aboriginal cultural heritage on the AMVA site. Aboriginal cultural heritage on the site was managed as summarised below. There were no unexpected finds.

Cultural Heritage Sites

There was one (1) Aboriginal cultural heritage site that was identified within the Subject Area. This site, Bulli Site 7 (Aboriginal Heritage Information Management System (AHIMS) ID# 52-2-3687), was an Open Camp Site (OCS) that comprised six (6) stone artefacts. As the site was to be impacted by the Project, it was recommended, in consultation with the Registered Aboriginal Parties (RAPs) in the ACHA (Niche 2021), that the artefacts identified during the test excavation which was completed as part of the ACHA and the isolated surface artefact at the site be reburied on Country within an area that will not be disturbed by the Project. The ACHMP outlined the management process for both Bulli Site 7 (AHIMS ID# 51-2-3687) and any unexpected finds identified within the Project Area.

Community Collection and Reburial

In accordance with community consultation undertaken as part of the ACHA for the Project (Niche 2021) and Requirement 26 of the DECCW (2010) *Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales*, the six (6) artefacts associated with Bulli Site 7 (AHIMS ID#52-2-3687) were reburied on Country. The location of this reburial site was determined by the RAPs in consultation with ICHPL to ensure the burial location is outside of any potential disturbance area.

The RAPs were notified of the proposed community collection date and process in accordance with the Consultation Protocol of the ACHMP. On 24 May 2022, the isolated artefact that remained on country was collected and included with the five (5) artefacts identified as part of the project test excavation for the purposes of the reburial. The reburial location is shown in Figure 2.¹⁰

In accordance with Requirement 26 of DECCW (2010), the following activities were completed for all Aboriginal objects that constituted Bulli Site 7 (AHIMS ID# 52-2-3687):

- A full catalogue, including photographic and drawn records of diagnostic stone artefacts was made.
- All stone artefacts were individually bagged and labelled with their unique artefact ID number. The stone artefacts were double bagged in good quality, plastic zip-lock bags and labelled externally using permanent marker. Each artefact bag contained information related to the (a) artefact ID number, (b) test pit number, (c) date of excavation and (d) depth.
- An independent label on Tyvek paper was written with permanent marker and placed within each bag (containing the details outlined in a-d above).
- Protected within plastic sleeves, the following documents were also placed in the reburial container: (a) project map showing the location of AHIMS sites and proposed reburial location, (b) map showing the location of the test pits, (c) excerpts from the Appin Mine Ventilation and Access Project ACHA related to Bulli Site 7, (d) Site card of Bulli Site 7, (e) soil profile descriptions and section photographs of the artefact bearing test pits, (f)

⁹ This management plan has now been made obsolete as the surface ground disturbance activities associated with construction are now completed.

¹⁰ This figure has been removed from the publicly available management plan at the request of the Aboriginal community.

excerpts from the ACHA related to the test excavation methodology and (g) an artefact catalogue with photographs.

- The aforementioned documentation and artefact bags were placed in a plastic sealed container with both external labelling in permanent marker, as well as a bagged Tyvek label.
- In the field, a full record of the final location of the collection was made, including:
 - Grid coordinates derived as set out in Requirement 8 of DECCW 2010.
 - A mud map referring to permanent features.
 - Depth of burial – 35 cm.
 - A photographic record of the location.
- Following the reburial, the following updates to AHIMS were conducted:
 - Bulli Site 7 (AHIMS ID# 52-2-3687): The impact to the site resulting from the community consultation and reburial were documented. Following the test excavation program and the collection of the only visible artefact on the surface of Bulli Site 7 (AHIMS ID# 52-2-3687), the site was reclassified as “Partially destroyed”.
 - Reburial Location for Bulli Site 7 (AHIMS ID# 52-2-4769): The reburial location was recorded as a new site.

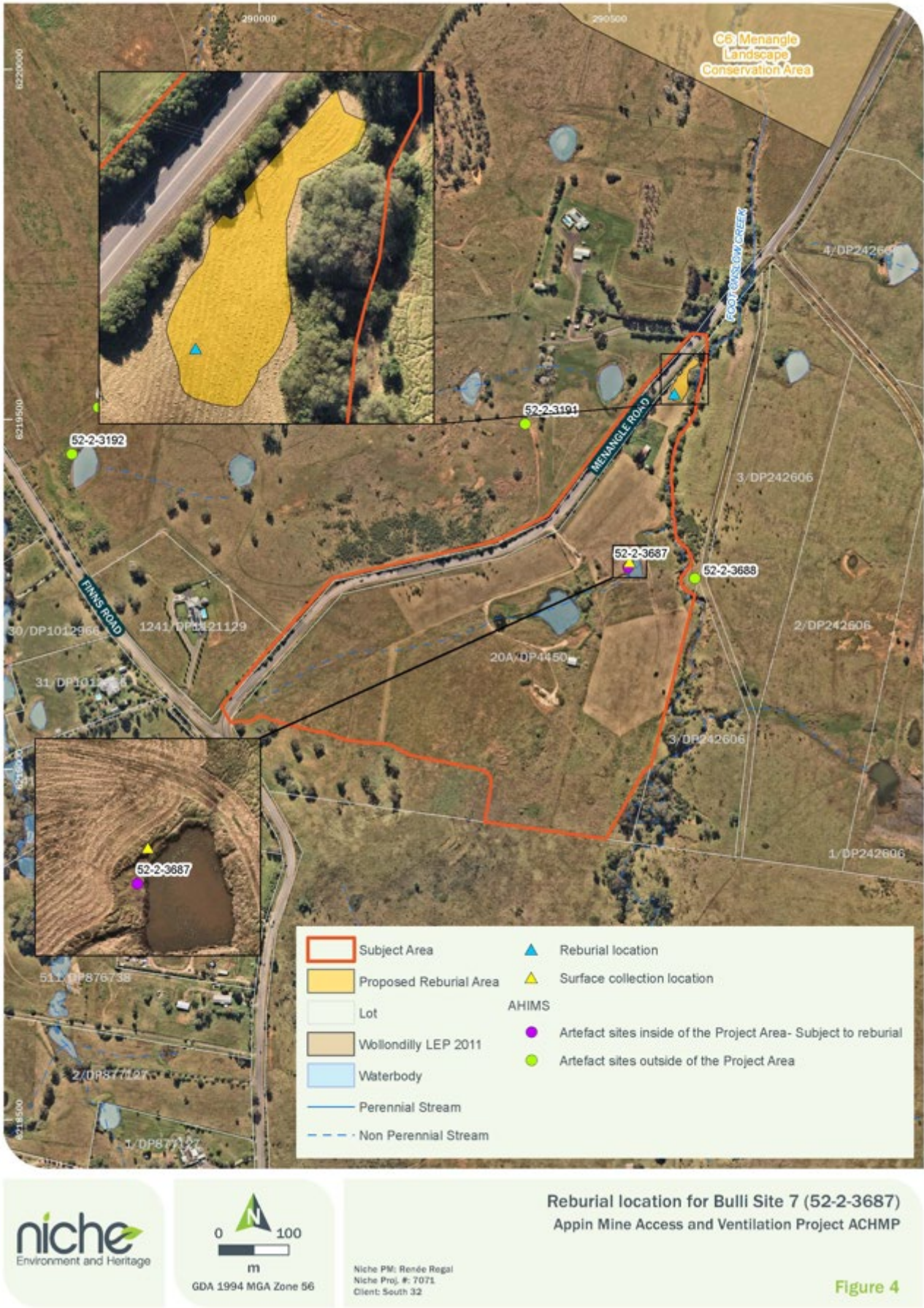


Figure 2: Reburial location

Appendix 8: Mountbatten Group Conservation Management Plan



ARCHIVE
HERITAGE

CONSERVATION MANAGEMENT PLAN

Mountbatten Group, Menangle Road, Douglas Park NSW



FINAL REPORT

Prepared for Illawarra Coal Holdings Pty Ltd

May 2025

REPORT DETAILS

Date	Version	Comments	Prepared by	Prepared for	Local Government Area
February 2025	Draft	For client review	Archive Heritage	Illawarra Coal Holdings Pty Ltd (ICHPL)	Wollondilly Shire Council
May 2025	Final	Final Report	Archive Heritage	Illawarra Coal Holdings Pty Ltd (ICHPL)	Wollondilly Shire Council

This report has been prepared by Archive Heritage in accordance with the brief provided by Illawarra Coal Holdings Pty Ltd (ICHPL), with reference to existing conditions and statutory controls and utilising research materials available at the time of preparation.

All findings, conclusions or recommendations contained in this report are based on this aforementioned information. Research materials utilised in this report are acknowledged and referenced. This report is for the use of ICHPL who may, at its discretion, use the report to inform regulators and the public.

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Minnamurra NSW

Title Image source: Morton Park stud farm, Campbelltown City Library, Image ID: 001646.

EXECUTIVE SUMMARY

Archive Heritage has been commissioned by Illawarra Coal Holdings Pty Ltd (ICHPL) (the proponent) to prepare an updated Conservation Management Plan (CMP) for the Mountbatten Group heritage item in Douglas Park (the subject area).

This CMP updates and replaces the earlier document prepared by Niche Environment and Heritage in 2020 for South32 in response to Policy 6.2.2 (5) of that document requiring that Conservation Policies should be reviewed every five years or whenever a major upgrade of the buildings and/or works within the curtilage, or new works within 300 meters (m) of the curtilage boundary are considered.

ICHPL are currently seeking a modification for the BSO Project (08_0150) under the State Significant Development provisions of Section 4.55(2) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). This modification is to allow the construction and operation of a regenerative thermal oxidiser to enable greenhouse gas abatement of ventilation air methane at the Appin Vent Shaft 6 site which is adjacent to (within 300 m of) the Mountbatten Group.

Preparation of this updated CMP therefore addresses the Policy in consideration of time elapsed since 2020, and in response to the proposed modification, as well as conservation works that have taken place within the curtilage since 2020.

SUMMARY OF SIGNIFICANCE

The Mountbatten Group heritage item, identified as 'Mountbatten Group – house, chapel and garden building' and its identified curtilage (**Figure 1**) is of local historical significance as an early homestead site in Douglas Park. The existing mid-Victorian form of the homestead and its setting date from the late 1850s, with successive phases of change evident in the fabric of the buildings. The group is significant for its ability to illustrate early ways of life.

The Mountbatten Group is of local historical significance for its association with Jean Baptiste Lehimas De Arrieta, who originally established the site in 1822, in the previously undeveloped Cowpastures. Upon arriving in the colony in 1821, De Arrieta took up a 2,000-acre grant, and along with his assigned labour, began clearing the land. De Arrieta's ownership of the site ceased in 1828 however, he lived at the property until his death in 1835 and this CMP has identified that built fabric and archaeological resources of De Arrieta's time on the property are likely to remain that contribute to the item's local significance under Criterion e (Research value).¹

The principal period of development of the site was between 1856 and 1914. During this period, the property was owned and occupied by Ellen Rosetta Hughes (McMullen) and saw the construction of the Main House. It was during this time that the present form of the buildings was substantially developed. It is likely that the Stone Stable dates from this period.

Substantial changes to the site commenced after Ellen Rosetta Hughes' death in 1914, with the property gradually subdivided and the Main House successively converted and adapted for various uses, including a weekend residence, guest and boarding houses, and later a riding school. These changes of use also effectively broke the continuity of the site as a farming property.

The Mountbatten Group has aesthetic significance at the local level as a good example of a mid-Victorian homestead complex in an open rural setting. The hilltop site provides a visual context which supports an

¹ Department of Planning and Environment NSW, 2023, *Assessing Heritage Significance: A NSW Heritage Manual Update*

understanding of the scale and character of the group during its mid-Victorian phase of development. Landscape components of the site and its setting have been identified as significant, these include the siting, layout, views and vistas, circular drive, and the garden surrounding the house, including the small Garden Building, together, in a wider open rural setting. These landscape components are consistent with other early homestead complexes in the region. The Cottage retains remnant elements of early brick construction, possibly pre-dating the Main House, however, the level of alteration and addition has substantially diminished its significance. The Stone Stable is simple in form with typical characteristics of a farm building, however, a high degree of the original stone fabric has been retained, reconstructed and conserved through efforts that attest to the value of the Mountbatten Group.

The integrity of the setting has been impacted over time through formation of the modern Hume Highway, the gradual urbanisation of Douglas Park and the surrounding landscape, as well as recent works close to the Main House, particularly the construction of Vent Shaft 6, and associated infrastructure. However, the Mountbatten Group as a whole retains good landscape values reflective of the development history and good connection to key views and vistas, notably to Spaniard's Hill and the Razorback Range. The item is of local heritage significance as a surviving, albeit a modified example of a 19th century homestead.

SUMMARY OF FINDINGS

The mining uses in the vicinity of the site are expected to continue until 2041. Until that time, it is intended to leave the buildings in an un-occupied state as compatible uses for the buildings are at present impractical. During this period ICHPL will manage and conserve the Mountbatten Group in a manner consistent with its heritage values and in accordance with the Conservation Management Plan. Conservation works have previously been undertaken for the Stable building that has been restored and repaired by specialists in a considered manner and now stands as an exemplar of conservation and management of a locally significant heritage asset.

The remaining key buildings and elements that form the Mountbatten Group include:

- The Main House, built in the rural Victorian Georgian style has been identified as having a diverse range of original fabric and later additions and alterations all in varying states of structural integrity. Although in a fair condition overall, the house displays significant deterioration common to 19th century structures including possible foundational movement, damp and pest affected timber members and weak-bodied masonry vulnerable to the above problems.
- The associated wings and separate sandstone Kitchen of the Main House hold high contributory significance for the group and present more straightforward conservation challenges.
- The separate Cottage, a composite building including some of the oldest structural fabric in the group, is in good condition overall. It is a unique building that demonstrates the site history in an effective and engaging way. It is however, undesirably grafted onto a ramshackle 20th century construction that intrudes upon and detracts from the heritage fabric.
- The garden, grounds and overall setting are highly contributive to the significance of the heritage item, demonstrating numerous historical structural additions and plantings that contribute to an evocative setting. The grounds and gardens are in good condition however they require further landscape maintenance in the form of reduction of windbreak and hedge heights and ongoing woody weed management.

THE RECOMMENDATIONS FOR THIS CMP ARE:

- The CMP should be adopted as the principal document used to guide future decisions affecting the Mountbatten Group site.
- Timber deterioration across the roof structure of the Main House poses significant threats to the structural integrity of the building and has been identified as requiring extensive remediation, as soon as practicable. Repair of flashing, roof plumbing and eaves should be undertaken as essential works while options are considered for repair and stabilisation of the broader roof structure and potential future use.
- The poor construction of the loft addition to the cottage threatens to allow the ingress of water and damp to the significant ground floor fabric. It is recommended that the proponent consider options for removal of these intrusive elements and reroofing of the cottage in order to best serve the future management of the building.
- The grounds and gardens are in good condition. It is recommended that hedge heights be reduced to their intended shape to enhance views to and from the item and that ongoing woody weed management continue to control self-sowing woody plants.
- The proponent should allocate funding for recurrent long-term care and maintenance of the heritage item.
- It is recommended the proponent pursue a maintenance program in accordance with the policies and Maintenance Plan set out in this CMP.
- Copies of the CMP are to be lodged with Wollondilly Shire Local Studies Library

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1 INTRODUCTION

1.1 PURPOSE OF THIS REPORT

Archive Heritage Pty Ltd (Archive) has been commissioned by Illawarra Coal Holdings Pty Ltd (ICHPL) (the proponent) to prepare an updated Conservation Management Plan (CMP) for the Mountbatten Group heritage item (LEP item ID: 172) in Douglas Park (the subject area).

This CMP updates and supersedes the earlier CMP prepared by Niche Environment and Heritage in 2020 for the proponent (then South32). This CMP has been prepared in response to Policy 6.2.2 (5) of that CMP requiring that the CMP and its Policies should be reviewed every five years or whenever a major upgrade of the buildings and/or works within the curtilage, or new works within 300 m of the curtilage boundary are considered.

ICHPL are currently seeking a modification for the Bulli Seam Operations Project (08_0150) under the State Significant Development (SSD) provisions of Section 4.55(2) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). This Ventilation Air Methane Abatement Project Modification proposes to allow the construction and operation of a regenerative thermal oxidiser to enable greenhouse gas abatement of ventilation air methane at the Appin Vent Shaft 6 site, which is situated within 300 m of the Mountbatten Group curtilage.

Preparation of this updated CMP therefore addresses the Policy in consideration of time elapsed since 2020, and in response to the proposed modification.

1.2 SITE DESCRIPTION

The subject area is the locally significant heritage item 'Mountbatten Group – house, chapel and garden building' and its identified curtilage (**Figure 1**) (LEP item ID: 172). The inclusion of 'chapel' as part of this listing relates to misidentification of a 19th century stable, discussed further in **Section 3.7**. The subject area is located at 670 Menangle Road, Douglas Park, within the Wollondilly Shire Council local government area (LGA). It is approximately 70km south of Sydney, 50 m west of the Hume Highway, and 500 m north-east of the town centre of Douglas Park. The subject area is contained within both Lot 1 DP 576136 and Lot A DP 42124. The current owner is GM³ (since 2010). The location and extent of the subject area is shown in **Figure 1** and **Figure 2**

1.3 METHODOLOGY AND STRUCTURE

This review of the heritage fabric and setting of the Mountbatten Group and review of Conservation Policies and Maintenance Strategies is based on the principles of the Burra Charter and guidelines provided by Heritage NSW for the preparation of CMPs. The review has been undertaken by experienced heritage practitioners as informed by the current condition of and existing documentation for the place and in consultation with management representatives of ICHPL.

This CMP has been prepared in accordance with the following heritage management documents:

- Australia ICOMOS, 2013, *Australia ICOMOS Charter for Places of Cultural Significance and The Burra Charter*
- Environment and Heritage NSW, 2021, *Statement of Best Practice for Conservation Management Plans*

- Environment and Heritage NSW, 2021, *Guidance on Developing a Conservation Management Plan*
- Environment and Heritage NSW, 2021, *Conservation Management Plan Checklist*,
- J.S. Kerr for Australia ICOMOS 2013, *The Seventh Edition Conservation Plan*
- Department of Planning and Environment NSW, 2023, *Assessing Heritage Significance: A NSW Heritage Manual Update*

This CMP reviews and supersedes a CMP prepared by Niche in 2020 for the subject area. As a result, this document includes cited information from that document as required.

This CMP has been prepared in accordance with Policy 6.22 of the 2020 CMP:

6.2.2 Implementing and reviewing the CMP

4. *The CMP should be adopted as the principal document used to guide future decisions affecting the Mountbatten Group site.*
5. *Conservation Policies should be reviewed every five years or whenever a major upgrade of the buildings and/or works within the curtilage, or new works within 300 meters of the curtilage boundary are considered.*
6. *The Maintenance Plan should be reviewed, in tandem with the review of the CMP Policies, to ensure it remains relevant in its approach.²*

Accordingly, this CMP reassesses existing conclusions and policies as outlined in the 2020 CMP and reviews, adopts and amends/replaces existing Conservation Policies for the place as determined by the current 2025 assessment. For consistency, this CMP broadly follows the structure of the previous document.

Two visual inspections of the subject area, the collective group of buildings and their individual fabric elements were undertaken by James McGuinness, Director of Archive Heritage, on 17 December 2024 and 10 January 2025 with assistance from Cody Brady, Principal Approvals, ICHPL.

1.4 AUTHORSHIP

This report has been prepared by James McGuinness, Director of Archive Heritage Pty Ltd.

1.5 ASSESSMENT LIMITATIONS AND CONSTRAINTS

This CMP has been informed by available historical resources and the built fabric accessible at the time of the site inspections. It does not provide an archaeological assessment for the heritage item or a consideration of Aboriginal cultural heritage.

1.6 TERMS AND DEFINITIONS

Standard terms and definitions referred to in this document are outlined in **Table 1**. These conform to industry best practise and reference texts.³

² Niche Environment and Heritage Pty Ltd, 2020. Mountbatten Group Conservation Management Plan, p36

³ R. Appleby, R. Irving & P. Reynolds 1998. A Pictorial Guide to Identifying Australian Architecture, Angus & Robertson press 1998.

Table 1. Terms and definitions used in this CMP including terms within Article 1 of the Burra Charter (2013) and

Term	Definition
Adaptation	Modifying a place to suit the existing use or a proposed use.
Conservation	All the processes of looking after a place so to retain its cultural significance.
Compatible use	Refers to a use which respects the cultural significance of a place. Such a use involves no, or minimal, impact on cultural significance.
Cultural significance	Encompasses aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups.
Fabric	All the physical material of the place including components, fixtures, contents, and objects.
Heritage Curtilage	The area of land (including land covered by water) surrounding an item or area of heritage significance which is essential for retaining and interpreting its heritage significance. It can apply to either land which is integral to the heritage significance of items of the built heritage; or a precinct which includes buildings, works, relics, trees or places and their setting.
Interpretation	All the ways of presenting the cultural significance of a place.
Maintenance	The continuous protective care of the fabric and setting of a place and is to be distinguished from repair. Repair involves restoration or reconstruction.
Place	A site, area, land, landscape, building or other work, group of buildings or other works, and may include components, contents, spaces and views.
Preservation	Maintaining the fabric of a place in its existing state and retarding deterioration.
Reconstruction	Returning the place to a known earlier state and is distinguished from restoration by the introduction of new material.
Rehabilitation	Restoring a building or site to a usable condition, potentially involving alterations or adaptations, while preserving its heritage significance.
Related place	A place that contributes to the cultural significance of another place.
Replacement detail	Elements of joinery, masonry or other material, internal or external, that replaces in a similar style missing parts of fabric, and which is materially Compatible and in scale with the missing fabric, but which is not consistent with Burra Charter definitions of restoration or reconstruction.
Restoration	Returning a place to a known earlier state by removing accretions or by reassembling existing elements without the introduction of new material.
Setting	The area around a place, which may include the visual catchment. Setting provides a contextual contribution to the cultural significance of a place.
Use	The functions of a place, as well as the activities and practices that may occur at the place.

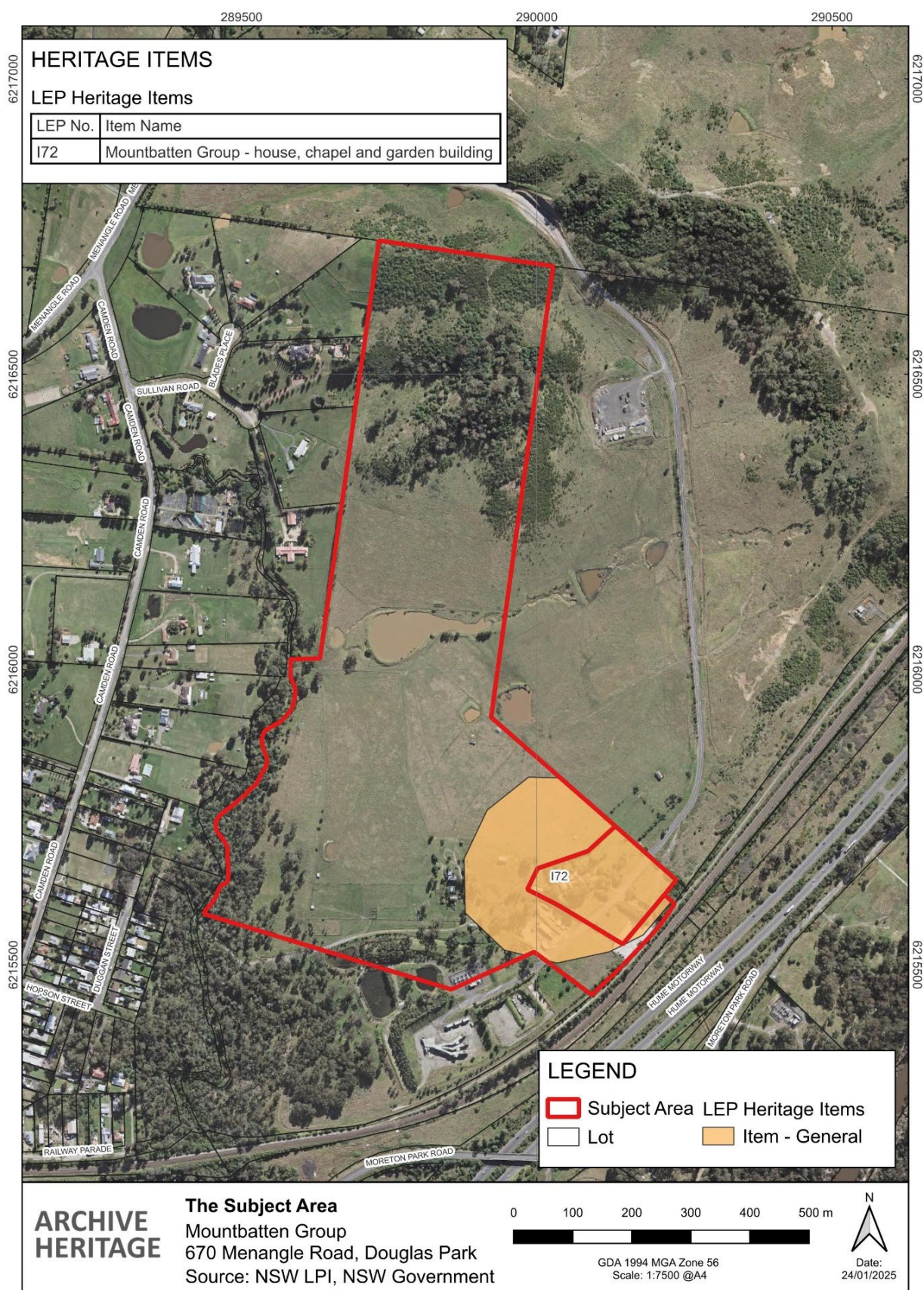


Figure 1. The subject area (Source: Archive Heritage)

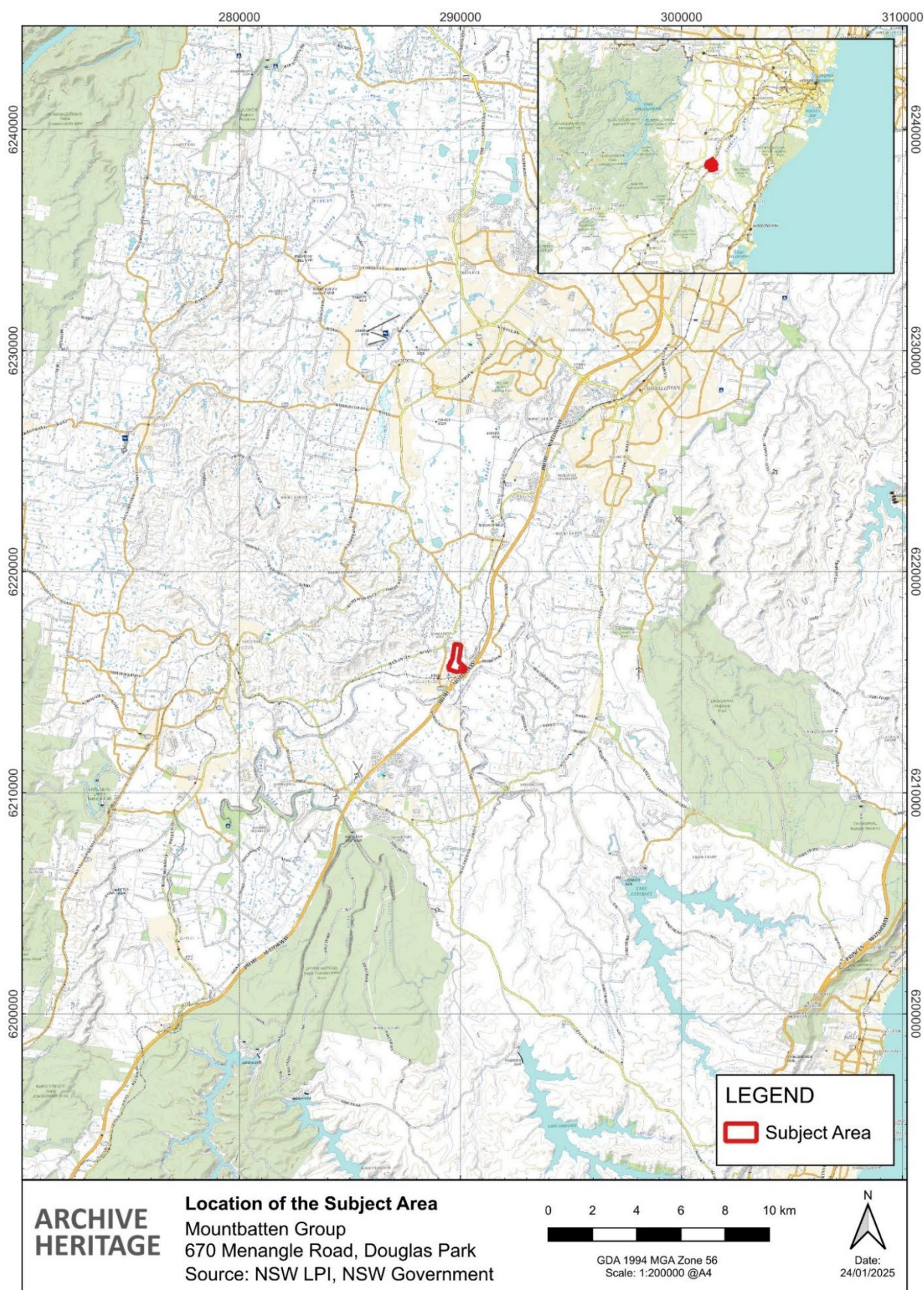


Figure 2. Location of the subject area within the Macarthur region, NSW (Source: Archive Heritage).

2 HISTORICAL CONTEXT

2.1 EUROPEAN EXPLORATION AND SETTLEMENT

The subject area is located within the traditional lands of the Gandangara and Dharawal people.

European incursions within the region surrounding the subject area commenced as early as 1790, when Captain Watkin Tench, William Dawes and George Worgan set out from Prospect to explore and record lands and potential resources to the south. Two subsequent expeditions were led by Governor Hunter in 1795 and in 1796 to inspect the grasslands of the southern Cumberland Plain after cattle had wandered into the region. Hunter found the area so suited to grazing that it was mapped and reserved for the purpose, becoming known as 'Cowpastures'. In 1802 military engineer and explorer Francis Barrallier travelled through the Cowpastures and reported on lands and resources in the vicinity of 'Manhandle' swamp.⁴ By 1805 Surveyor James Meehan had been instructed to form the Cowpastures Road (Camden Valley Way) to the ford across the Nepean at today's Camden.

The region was soon a focus of agricultural investment at a time when successive droughts were severely impacting colonial resources and expansion beyond Sydney. Early landholdings were initially occupied by stockmen and convict labourers while forest was cleared and livestock were acquired. The first small dwelling within the region, referred to as 'Cowpastures House', was built as accommodation for government stockmen (**Figure 3**). Construction of government roads soon encouraged more permanent settlement along the Nepean and the Cowpastures region saw a high proportion of usually absentee landholders moving onto their estates and overseeing the management of some of the most extensive agricultural farms in colonial NSW at that time. The scale of nepotistic land acquisition is neatly illustrated in a plan of 1829 (**Figure 4**) that shows the extensive 'Camden' holdings of John Macarthur across a region that today bears his name. Macarthur's vast Camden acquisitions reflect the direct involvement of Colonial Secretary Lord Camden, with whom Macarthur was working to develop a wool supply to the burgeoning British milling industry.⁵ So successful was Camden that the entire estate, operated from 'Belgenny Farm' and later 'Camden Park', was admired as a model agricultural development.

⁴ Wrigley J. 2001. A history of Camden, New South Wales, in: Camden History - <https://www.camdenhistory.org.au/chhistoryofcamden.html>, accessed 12 January 2025.

⁵ Ibid.



Figure 3. View of Government Hut by the Nepean at Cowpastures (Elderslie), 1804 (Source: SLNSW, ID: 1804 SSV1B/Cowp D/1).

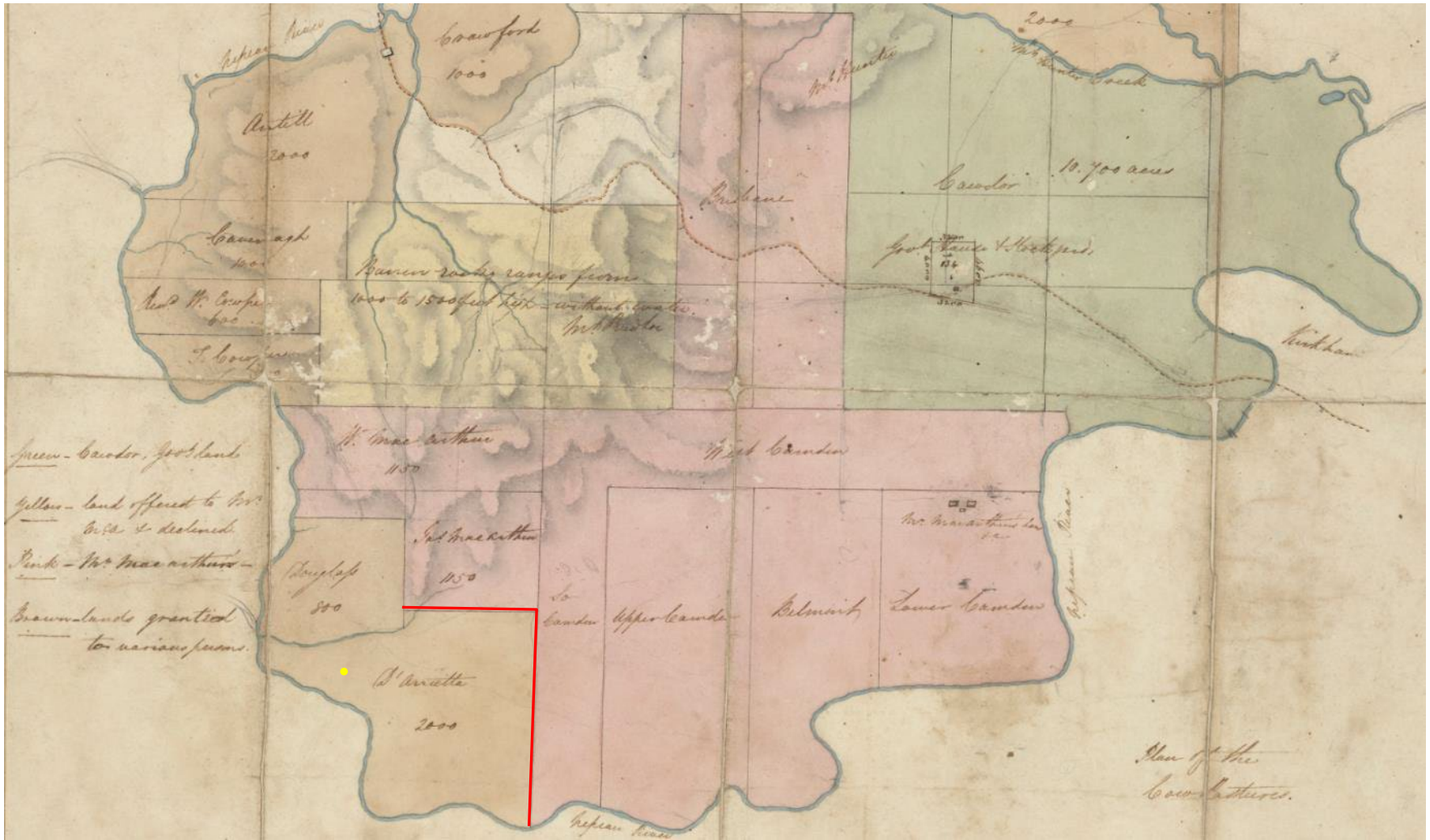


Figure 4. An 1829 Plan of the Cowpastures (west to top). The approximate location of the subject area within De Arrieta's 2,000 acre grant is indicated in yellow. (Source: SLNSW, ID: M Ser 4 000/1 A 3004/Map 20 with Archive mark-up)

2.2 MORTON PARK ESTATE

2.2.1 CROWN GRANT TO JEAN BAPTISTE LEHIMAZ DE ARRIETA

Smaller farms within the region of the Camden Estate experimented with mixed crop and livestock farming to supply the Sydney markets.⁶ By the 1820s fledgling farms stretched throughout the length of the Nepean River, including the 2,000 acre holding of Jean Baptiste Lehimas De Arrieta, possibly Australia's first Spanish settler. De Arrieta's land included the subject area and extended east of Harris Creek and north along the western bank of the Nepean to Macarthur's Camden Estate. Dr Henry Gratin Douglass, Superintendent of the Parramatta Female factory, was granted 800 acres west of Harris Creek the same year and other prominent figures in early colonial commercial and administrative life held properties adjoining Morton Park, including James Macarthur (son of John), public servant William Broughton and pastoralist and merchant Alexander Riley.

De Arrieta had only arrived in Sydney as a free settler the previous year, and although a Spaniard, had received his sizable grant adjacent to the coveted Cowpastures and 30 cows from the government stock due to money owed him for services to the British Commissary during the Peninsular War of 1807-1814, and his capacity to invest capital into sheep grazing, mixed cropping and viticulture. At this time it is apparent that De Arrieta had begun to earn something of a reputation as someone of ill fortune resulting not only from losses to his family estate resulting from the Peninsular War but also perhaps through inadvisable speculative ventures. He appears to have gained the land as much by calling on his personal connections within Britain as by genuine capital.⁷ This patronage is reflected in the name he gave his property, 'Morton Park', in honour of his 'good friend' and subsequent parliamentarian William Morton Pitt.

2.2.2 ASSIGNED SERVANTS AND IMPROVEMENTS

Under typical conditions of grant, De Arrieta was required to manage 20 assigned convicts and improve his land which he could not sell or alienate for a period of five years, De Arrieta applied to have his land cleared and was assigned his first convict in February 1822. A Thomas Talbot was soon appointed overseer of De Arrieta's clearing party and De Arrieta received authority from Governor Brisbane to select:

*'...from twenty-two convicts the best calculated in your opinion to carry into effect the wishes intimated in your letter of having one hundred and fifty acres of land cleared on your Estate in the Cow Pastures'*⁸

Payment for the use of convicts was by a levy of wheat at the rate of six bushels for every acre cleared. Between 25 March 1822 and 24 June 1823 the clearing gang prepared a total of 205 acres at Morton Park. By September 1824 42 people were living at the property including De Arrieta, his overseer and 40 assigned convict servants and labourers.⁹ Of the 2000 acres, 489 had been cleared and stumped. Sixty of these acres were sown with wheat, two with oats, ten with barley and one with potatoes. An orchard had been planted on a further eight acres. In addition, there were 200 bushels of wheat and 20

⁶ Michael Pearson Heritage Management Consultants Pty Ltd, 2009, Bulli Seam Operations Non-Aboriginal Heritage Assessment (Statement of Heritage Impact) A Report for Illawarra Coal Holdings Pty Ltd, p.9

⁷ Ballyn S. & Frost, L. 2001, Chain Letters: Narrating Convict Lives - A Spanish Convict, her clergyman biographer, and the amenuensis of her bastard son. University of Tasmania. Chapter. <https://hdl.handle.net/102.100.100/490581>, Accessed 11 January 2025

⁸ 22 March 1822, Copies of letters sent within the Colony 1814-1825, NRS 937, 4/3505, pp64-65).

⁹ Niche 2020, p.16)

bushels of maize in store, and the stock consisted of 48 cattle and 62 hogs, carrying the brand 'De A'.¹⁰ An unknown artist recorded the dry, forested landscape from what is probably Spaniard's Hill, purportedly in 1824 (**Figure 5**). The location and quality of the sketch indicate it is highly likely to have been made by government Surveyor General Sir Thomas Mitchell who did not arrive in the colony until 1826 but made a close study of the subject area and Razorback Range during the 1830s, prior to taking up land at East Bargo. At that time Mitchell made a topographic field sketch of the region surrounding the subject area, noting the position of De Arrieta's homestead and his existing cart track over Spaniards Hill to Camden and a horse trail east over the Nepean into Deputy General Commissary William Broughton's 'Lachlan Vale' Estate, from whence he could have travelled overland to Appin, Campbelltown and Illawarra (**Figure 6** and **Figure 7**).

2.2.3 MARRIAGE AND CHILDREN

In 1826 De Arrieta must have become acquainted with a counterpart, the newly arrived James Stares Spearing, who set up the successful though financially costly Mount Keira Estate in Wollongong from 1826. De Arrieta married James' daughter Sophia Spearing in what was evidently something of a shotgun wedding in 1828. According to the parish register of St Peter's Church of England in Campbelltown the couple were married by licence in the 'place of worship, Morton Park'.¹¹ A letter written by Elizabeth Marsden, wife of the reverend Samuel Marsden in August 1826 documents that Protestant Reverend Thomas Reddall preached the last Sunday in every month at De Arrieta's Morton Park property and he is therefore the likely celebrant.¹² The marriage of Catholic De Arrieta to Sophia by a Protestant celebrant, though technically impermissible, would not have been unusual under the ad-hoc circumstances of frontier life.¹³ Similarly, the 'place of worship' at Morton Park could have simply been a residence or even an agricultural barn – as was the case in other marriages¹⁴ and they soon had a daughter, Louisa Sophie. In 1830 son Walter Lehimas was born.

2.2.4 FINANCIAL DIFFICULTIES

The location was a remote one (**Figure 8**) and despite the efforts of his many low-cost convict labourers De Arrieta appears to have suffered financial difficulty almost immediately. In 1824 he defaulted on the grain payment for his convict mechanic¹⁵ and took out a substantial private mortgage against the property serviced by Samuel Terry. By the time Sir Thomas Mitchell's sketches were made of the property De Arrieta's fortunes had not improved.¹⁶ His situation, as well as the spirit of his young wife, is encapsulated by the account of a visitor who witnessed Sophia smashing a pumpkin over his head, to which he responded by exclaiming that she was wasting pumpkin seed.¹⁷ He lamented his frustration with 'his embarrassments'¹⁸ and lack of control over his fortunes to visitors. He grew tobacco but the crop was a failure. His relations with his assigned convicts were strained and possibly adulterous¹⁹ and his limited success with crops was dashed when his grain store burned to the ground, apparently in an

¹⁰ GB&A 2013.

¹¹ Register of St Peter's Campbelltown 1828, Reel 5003, State Records of NSW, Register of Baptisms, Burials and Marriages, Registry Volume 11-16 Part, No.35 (State Reference Library); GB&A 2012, p.13.

¹² Letter from E M Marsden to Mrs T Hassall', Hassall Correspondence, 3 August 1826, Vol.4, p.986 (Ref: A1677-4/CY929), Mitchell Library; GB&A 2012, p.15.

¹³ GB&A 2012, p.15.

¹⁴ J S Hassall, In Old Australia. Records and Reminiscences from 1794, North Sydney: Library of Australian History, 1981, p.8; GB&A 2012, p.15.

¹⁵ Main series of letters received 1788-1825, NRS 897, 4/1778, p.265a; GB&A 2012, p.11.

¹⁶ Michael Pearson HMC 2009; Niche 2020

¹⁷ Ballyn & Frost 2001, p.102

¹⁸ Ibid.

¹⁹ Ballyn & Frost 2001

act of arson by aggrieved assigned servants. As his misfortunes mounted his anxiety appears to have manifested itself through a perimeter line of staked guard dogs around his homestead.²⁰

De Arrieta was forced to offer his land for sale in 1827 and possibly as early as 1825. He did not sell however until 1831 when his mortgagee assumed ownership. De Arrieta's hardships stand in stark contrast to the extraordinary fortunes that were made by other land barons throughout the region, none more prominent than Samuel Terry. A remarkably shrewd and capable former convict, Terry would go on to become the richest man in the colony, developing a portfolio that descendant and biographer Gwyneth Dow conceded 'defies assessment'.²¹

De Arrieta soon lost the property entirely to Terry and he and his family remained tied to the property as tenant farmers. De Arrieta died on the property in 1837 or 1838 at around 60 years of age and his wife Sophia married a William Walker and moved to Sydney in 1838.



Figure 5. An early sketch taken 'from ye grounds of Morton Park, looking westward over to ye Blue Mountains'; by an unknown artist, possibly Sir Thomas Mitchell (Source: SLNSW ID: FL3254883)

²⁰ Ibid.

²¹ Dow, G. 1967, *Samuel Terry (1776–1838)*, *Australian Dictionary of Biography*, Volume 2, <https://adb.anu.edu.au/biography/terry-samuel-2721>



Figure 6. Sir Thomas Mitchell's field sketch of the vicinity of today's Douglas Park showing the positions of De Arrieta's homestead and Spaniard's Hill (SLNSW ID: FL3311088 with Archive mark-up.)



Figure 7. Topographic aerial photo showing the same ground as that in Figure 7 (Source: Google Earth with Archive mark-up).



Figure 8. c.1840 plan attributed to Thomas Mitchell indicating principal roads at that time. The approximate modern suburban boundary of Douglas Park is shown in red with the subject area in yellow (Source NLA, ID:nla.obj-536488784 with Archive mark-up)

2.2.1 OWNERSHIP UNDER THE TERRY FAMILY

Following Samuel Terry's death in 1838 Morton Park was left to his widow, Rosetta. However, the death of Samuel Terry's son, Edward, in December 1838, complicated the settlement of his father's will and it was not until 17 July 1844 that Lachlan MacAlister's mortgage interest in Morton Park was formally assigned to a trustee for Rosetta Terry. It then took a further seven years - to 30 September 1851 - for the mortgage to be taken from trust and assigned to Rosetta.²² On 25 August 1858, Rosetta Terry executed a deed conveying Morton Park to her granddaughter, Ellen Rosetta Hughes ('Ellen Rosetta'). Born on 20 September 1826, Ellen Rosetta was the daughter of Esther Marsh, Rosetta's second child, and John Terry Hughes, the son of Samuel Terry's sister, Ellen.²³

The property was occupied by overseers and tenant farmers following Samuel Terry's acquisition. Including De Arrieta who remained until his death in 1838, and a Sylvanus Abbott was recorded as the occupant at 'Moreton Park' - as it was sometimes spelled - in 1841, together with six other tenant farmers.²⁴ a 'Mr Whelan' resided within the old house on the estate after that date, who held the whole place as overseer, except that held by the then tenants of the family.²⁵

2.2.2 ELLEN ROSETTA MCMULLEN (NEE TERRY)

Ellen Rosetta married Samuel Terry Hughes in 1847²⁶ and the couple would have four children. They began building a new home at Ellen's Morton Park property in 1865- Ellen laying the foundation stone²⁷ and moved to the property in 1868 when the house was nearing completion. The large, spacious family 'cottage' was modelled on the symmetrical, early Victorian tastes of the time and echoed similar large cottages of the region, such as at Camden Park (**Figure 9**). The Hughes purportedly had the old house, which was made of wood, pulled down when their new home was built²⁸, suggesting that De Arrieta's timber house stood close by the current building.

Soon after the Hughes' relocation to Morton Park Mr Hughes died and Ellen soon hired Franklin McMullen as overseer of the property.²⁹ She continued with the tradition of tenant farming and retained a close connection to estate tenants, including hosting them at Christmas and distributing gifts to all³⁰ and suspending their rents during hard times.³¹ Ellen was well-known for her charity and social connections across all levels of society, counting among her friends Sir Thomas Mitchell of nearby Park Hall Estate at East Bargo, as well as 'Mrs. De Arrieta', likely one of four daughters born to Walter De Arrieta, who was still a youth at the time of his father's death in 1838 and had been raised and educated largely by charitable gestures.³² Ellen was gifted items of gratitude in return for her charity, including a

²² Niche 2020, p.17; GB&A 2013.

²³ Niche 2020, p.18; GB&A 2013

²⁴ NSW Government, 1841 Census: Abstract of returns, CGS 1282, Reels 2222-2223, SRA.; GB&A 2012, p.17.

²⁵ Ibid.

²⁶ Ibid; Lynch 2013

²⁷ 1914 'ELLEN ROSETTA McMullen. AETAT 87.', Camden News (NSW: 1895 - 1954), 16 April, p. 3, viewed 23 Jan 2025, <http://nla.gov.au/nla.news-article133119346>

²⁸ Ibid; 1841 Census.

²⁹ OBITUARY." *The Campbelltown News* (NSW: 1920 - 1953) 17 September 1937: 1. Web. 22 Jan 2025 <<http://nla.gov.au/nla.news-article262014142>>

³⁰ 1897 'Douglas Park.', Camden News (NSW: 1895 - 1954), 18 November, p. 5, viewed 23 Jan 2025, <http://nla.gov.au/nla.news-article133283385>

³¹ Ibid

³² GB&A 2012, p.97; 1899 'Ball at Moreton Park.', Camden News (NSW: 1895 - 1954), 19 October, p. 4, viewed 23 Jan 2025, <http://nla.gov.au/nla.news-article133048119>; 1914 'ELLEN ROSETTA' Camden News

'handsome clock' and she hosted parties, 'a grand concert'³³, balls and picnics at regular intervals.³⁴ Her generosity also extended to the homeless, as she hosted and prepared meals for 'swaggies' that knew the property as a temporary refuge while travelling through the country. Ellen is recorded as hosting 30 or 40 swagmen at a time, accommodating them in 'the sheds' and feeding them from ovens adjoining the Kitchen, where a warm fireplace held the inscription 'enough and to spare A.D. 1865'.³⁵ The same inscription within the current detached Kitchen indicates this building is the original Kitchen. Ellen also solely funded the construction of the Church of England at Douglas Park.³⁶

In 1874 Ellen married Franklin McMullen, who had become a horse breeder and importer. Together and under the management of Stud Manager Edward Keane, they developed Morton Park as a stud farm complete with a private racecourse (**Figure 10**).³⁷ They erected the current Stable building as well as numerous outbuildings. Several agricultural buildings, wells and other features within the property may have been adapted from preexisting structures.

In 1893 Ellen Rosetta made an application to bring De Arrieta's original grant measuring 2,497 acres under the provisions of the Real Property Act. The property was then valued at £12,000. As noted previously³⁸ Ellen's Statutory Declarations attending the application related that:

*The fences between Morton Park and Camden Park were in 1858, where they are now. The boundary fence between Morton Park and Camden Park were in 1858, where they are now. The boundary fence between Morton Park and Douglas Park, now Elders Property, is now where it was in 1858.*³⁹

Ellen Rosetta died at Morton Park, aged 87 years in April 1914. Two further children had been born to Ellen and Francis and a son to her previous marriage, Henry Hughes, was managing the stud farm at the turn of the century up and until his death at the age of 40 in 1904.⁴⁰ Sadly, Ellen outlived all of her six children, some of whom did not survive their youth. Following Henry's death the property was managed by Morton Park tenant farmer T. Blades and Edward Keane, who had come to reside at another property at Theresa Park.⁴¹ In 1914 Morton Park was left in trust for Ellen's grandchildren and a great granddaughter and Franklin McMullen retired to Campbelltown

³³ *Australian Town and Country Journal*, 18 Feb 1893, p35

³⁴ Lynch, C. 2017, Oral History with Mrs Cora Wrightson, Campbelltown City Library, https://www.facebook.com/groups/MuseumMacarthur/posts/379763777155987/?_rdr

³⁵ Ibid.

³⁶ 1904 'Obituary.', *Camden News* (NSW: 1895 - 1954), 20 October, p. 1, viewed 23 Jan 2025, <http://nla.gov.au/nla.news-article133121591>

³⁷ 1914 'ELLEN ROSETTA' *Camden News*

³⁸ GB&A 2012, p.20

³⁹ (E R McMullen, 31 May 1893 PDHFS)

⁴⁰ 904 'Obituary.', *Camden News* (NSW: 1895 - 1954), 20 October, p. 1, viewed 23 Jan 2025, <http://nla.gov.au/nla.news-article133121591>

⁴¹ Ibid.



Figure 9. 1842 view of the Manager's House at Camden Park, a typical Cowpastures residence of the first half of the 19th century that is echoed by Mountbatten. (Source: SLTAS, SD_ILS:8)



Figure 10. Late 19th century photograph of two men, possibly including McMullen, at Morton Park stud farm (Source: Campbelltown City Library, Image ID: 001646)

2.3 SUBDIVISION AND MODERN DEVELOPMENT

2.3.1 EARLY 20TH CENTURY CHANGE WITHIN THE ESTATE

A year after the death of Ellen Rosetta, Morton Park was advertised for sale as three separate lots in the *Picton Post* in February 1915 and again on 10 March 1915. Lot 1 of 1,577 acres in extent included the 'homestead of brick and stone plus all outbuildings'. The first subdivision deposited plan created a total of 38 farm lots declared on 9 January 1917 (**Figure 11**), many of which were purchased by the Blade family of Douglas Park⁴². The property that is the subject of this report was located across Lots 7, 37, 36 and 38 (DP 8738). In June 1932, these Lots, along with Lots 20 and 22 in DP 8738 and Lot 35 in DP 8999, were purchased by John Stanley Haddin.⁴³ In January 1939, Haddin's land was purchased by two brothers, Alfred E and Cyril W Hudson, both timber merchants. By April 1939, the land had been sold again - this time to Maurice and Margaret Terpening.⁴⁴

2.3.2 MOUNTBATTEN GUESTHOUSE AND STUD FARM

The Terpenings reportedly spent considerable sums renovating the homestead,⁴⁵ indicating that much of the timber and several extensions, including the north-eastern addition, probably date to this time. Share-farming continued with both the Tredinnick (c.1940-47) and Higgins (c.1947-67) families recorded as carrying out dairy farming on the land.⁴⁶ Members of the Starr family, long-term residents of the Menangle area, photographed their humble tenant farm home during the 1930s (**Figure 12**).

The Terpenings advertised Morton Park as a guest house for children in 1945 and as 'Mountbatten' in Douglas Park in 1947 and 1948, a 'home from home' retreat with tennis court, dairy and billiards.⁴⁷ An aerial photograph of the property soon after this date indicates that by 1950 the Main House was consistent with its current layout and contained all heritage plantings and landscaping that forms part of the heritage listing today (**Figure 13**).

In June 1950, Gerald Hemsworth purchased the homestead Lot 8, DP8738 and continued to run it as 'Mountbatten' guesthouse with the addition of a swimming pool. He built a swimming pool and appears to have utilised part of the house as a dance hall, probably the Kitchen, as this was also an 'entertainment room' under the Terpenings. It may also be the McMullen's 'ballroom' of the latter 19th century.

The homestead property was afterwards alternately named 'Mountbatten' (Mount Batten) and Morton Park over successive phases of use. In the 1960's parts of the former estate were conveyed to the McCall Dairy Company. During the latter 20th Century the homestead and adjoining Lots became known as both the 'Moreton Park Stud Farm' and 'Mountbatten Stud Farm'. During the 1980s it was conveyed piecemeal to the Australian Iron and Steel Pty Ltd. and acquired by the Macarthur Development Board. In 1991 it operated as a cattle stud and in 2010 Lot A, DP421246 and Lot 1, DP576136 were purchased by Illawarra Coal Holdings Pty Ltd a subsidiary of BHP Billiton, prior to transfer of ICHPL ownership to South32, and most recently the joint venture entity GM³.

⁴² Stirling 1984, p.7; GB&A 2013

⁴³ Certificate of Title, Vol.4533, Fol.199 (LPI NSW); GB&A 2012, p.21.

⁴⁴ Dealing recorded in CT Vol.4533, Fol.199.

⁴⁵ Hennings and J McMonnies, National Trust of Australia (NSW) Classification – Morton Park, unpublished, 23 Aug 1994.

⁴⁶ GB&A 2012, p.21.

⁴⁷ *Sydney Morning Herald* Hotels & 'Holiday Resorts – Douglas Park', 8 Dec 1945, p.21; *Sydney Morning Herald*, 'Hotels & Holiday Resorts – Douglas Park' 4 Nov 1947, p.16; GB&A 2012, p.21.

2.3.3 SURROUNDING DEVELOPMENT

Neighbouring landowner Henry Gratin Douglass retired to his property where he died in 1865.⁴⁸ Arthur Douglass inherited the land, naming his estate 'Hoare Town'. To fulfil the terms of the land grant he lived there for three years with his mother.⁴⁹ As the Hoare Town land grant was sold and sub-divided the area became known as Douglass's Park. This became Douglas Park, a name officially adopted by council in September 1904. The Post Office at Douglas Park was opened in 1860, and the railway station opened in 1869. The telephone line was extended from Campbelltown to Douglas Park in 1904. In June 1917, subdivision of part of the land to the immediate west of the Morton Park estate – originally part of the grant made to Arthur Douglass - occurred with the registration of DP8999.

Spaniards Hill, on the western boundary of De Arrieta's land, was named for Arrietta, and was the site of the first school in Douglas Park, a Catholic school established in 1862.



Figure 11. A 1922 subdivided plan of Morton Park Estate, with the 38 Lots possibly denoting former tenant farm boundaries (Source: HLRV)

⁴⁸ Ibid.

⁴⁹ Mylrea 2000: 12, Wrigley 1988: 8



Figure 12. Circa 1930 view of the home of the Starr family, tenant farmers on Morton Park. Estate (Source: Camden Council Library. Image ID: CL0187)



Figure 13. 1950 aerial photograph of the Terpening's 'Mountbatten' (Morton Park) guesthouse showing the extent of buildings at that time (Source: Spatial Services NSW)

2.4 HISTORICAL SUMMARY

In addition to the above historical outline the following summary can be provided for the key phases of development for the subject area (Table 2).

Table 2. Historical summary for the subject area (Source: compiled after Stirling 1984; GB&A 2012).

Phase	Ownership	Development Within the Subject Area
Phase 1 (1822-1856)	Jean Baptiste Lehimaz De Arrieta/ Samuel Terry	February 1822 - Jean Baptiste Lehimaz De Arrieta applied to have his land cleared assigned his first convict (name unknown). July 1822 - Land formally granted to De Arrieta February-March 1822 - Thomas Talbot appointed overseer of De Arrieta's clearing party. Permission granted to select 22 convicts for assignment to Morton Park. June 1823 - A total of 205 acres was cleared at Morton Park May 1823 - De Arrieta borrowed £507 from Abraham Pollack, celebrated Sydney Auctioneer. August 1824 - Mortgage from Samuel Terry in the amount of £2420/19/6. September 1824 – Dwellings and necessary agricultural buildings and wells etc built and 42 people living at Morton Park including De Arrieta, his overseer and 40 convicts employed at various tasks. Late 1824 – wheat, oats, maize, barley and potatoes sown at Morton Park. An orchard planted, 48 cattle grazing and 62 hogs present. May 1825 - Legal measures contemplated by the colonial government against De Arrieta to secure payment due for wheat owed for convict labour. 1826 - Unseasonal weather ruined 60 acres of wheat crop August 1827 - Morton Park advertised for sale February 1828 – De Arrieta married Sophia Spearing and daughter Louisa Sophie born 1828 - Three horses and 86 head of horned cattle on the property. Eleven assigned government servants present – one female servant, three tobacconists, a groom, a shoemaker, a sawyer, a cooper and three labourers. 1830 - Son Walter Lehimas born March 1831 - Conveyance of the property from De Arrieta to Samuel Terry February 1838 – Death of Samuel Terry,

Phase	Ownership	Development Within the Subject Area
		March 1838 - Death of De Arrieta, tenant at Morton Park. His personal estate listed as 'several Stacks of Wheat and Hay, Farming Implements, Drays, Carts, Working Bullocks, Dairy Cows, Pigs, Superior Gig Horse, Brood Mares, Colts and Fillies, a quantity of superior Leaf Tobacco, Household Furniture, well-seasoned Flooring Boards, Iron Bark Shingles, and other effects'⁵⁰ 1841 - Sylvanus Abbott recorded as the occupant at 'Moreton Park' together with six other tenant farmers. July 1844 - Assignment of Mortgage to Rebecca Fox on trust for Rosetta Terry Pre 1856 - 'Mr Whelan' resident within the 'old house' on the estate as overseer of property and tenant farms.
Phase 2 (1856-1914)	Ellen Rosetta McMullen (nee Terry)	1856 – Old house pulled down and construction commenced on new Morton Park homestead of Ellen Rosetta Hughes and her husband Samuel Terry Hughes. Kitchen built prior to Main House. August 1858 - Conveyance from Rosetta Terry to Rebecca Fox on trust for Ellen Rosetta Hughes. 1858 – Completion of Main House. Death of Samuel Terry Hughes 1859 - 29 tenants (persons) resident at Morton Park. 1872 - 26 tenants (persons) resident at Morton Park. April 1874; Marriage of Ellen Rosetta Hughes to horse breeder Franklin McMullen. Morton Park developed as a stud farm with yards, stables and a private racecourse. 1894 – 22 Resident tenants at Morton Park estate May 1893 - The property, valued at £12,000, brought under ownership of Ellen Rosetta McMullen under the provisions of the Real Property Act (26 Victoria No.9). 1893 - Public school at Spaniards Hill present on the Morton Park estate. April 1914 - Ellen Rosetta died at Morton Park aged 87 years. Her estate valued at £62,401 was left in trust for her grandchildren and a great granddaughter.
Phase 3 (1914-1960)	Various	February-March 1915 - Morton Park including 'homestead of brick and stone plus all outbuildings' advertised for sale.

⁵⁰ 'Last Will and Testament of Jean Baptiste Lehimas De Arrieta – dated 13 October 1836', Probate Packet, Series 13660, Cons 1, Cont 14/3197, Item Series 1-908.

Phase	Ownership	Development Within the Subject Area
		January 1917 - First subdivision deposited plan created for 38 farm lots, many of which were purchased by the Blade family of Douglas Park. June 1932 - Lots 7, 37, 36 and 38 (the subject area) purchased by John Stanley Haddin. January 1939 - Haddin's land purchased by Alfred E and Cyril W Hudson, timber merchants. April 1939 - Land again sold to Maurice and Margaret Terpening. Pre-1945 – The Terpenings renovate and improve the house and grounds in preparation for use as 'Mountbatten' guesthouse (first use of the name). June 1950 - Gerald Hemsworth purchased Lot 8, DP8738 and continued to use Mountbatten as a guesthouse. July 1975 – Further subdivision takes place forming Lot 1, DP576136, upon which the stone Stable is now located.
Phase 4 (1960-Present)	Various	C. 1960 - Parts of the former estate conveyed to the McCall Dairy Company. Post-1960 - The homestead and adjoining Lots became known as both the 'Moreton Park Stud Farm' and 'Mountbatten Stud Farm'. 1980s - Conveyed piecemeal to the Australian Iron and Steel Pty Ltd. and later acquired by the Macarthur Development Board. 1991 - Operated as a cattle stud. 2010 - Lot A, DP421246 and Lot 1, DP576136 were purchased by Illawarra Coal Holdings Pty Ltd, which became a subsidiary of BHP Billiton 2024 - GM³ assume ownership of ICHPL, owners of the property.

3 PHYSICAL EVIDENCE

The following section outlines the key physical components comprising the study area and its setting.

3.1 SITE COMPONENTS

The subject area comprises four main components (See **Figure 14**). These are:

1. the Grounds and Garden including the Carriage Loop and Entrance Drive;
2. the Main House complex including the separate sandstone Kitchen;
3. the 'Cottage'; and
4. the Stable (misidentified as a Chapel).

The current heritage listing title requires updating and is incompatible with these elements, referring only to the house, 'Chapel' (Stable) and a small, 20th century brick Dovecote within the grounds. For the purpose of this CMP analysis of the physical evidence is divided into these four key components. These are described below as well as their individual built fabric elements. Relative significance for these elements is presented in **Section 4.1.3**.

3.2 THE SETTING

The subject area is located north of Douglas Park village and west of the Hume Motorway and Moreton Park Road. Access to the site is currently via the GM³ Vent Shaft 6 access road off Menangle Road (**Figure 15**).

Geographically, the subject area falls within the southern part of the Cumberland Plain and is situated 600 m west of the Nepean River, the major watercourse of this broad geographic feature. The homestead group is placed on the end of a low spur line that curves east and south from Spaniards Hill (**Plate 2**), the north-eastern extremity of the Razorback Range. The subject area is set in rolling low hills on grazing RU2 zoned land.

The homestead enjoys sweeping northerly and westerly views over this terrain, as well as the catchment of Harris Creek that drains south from it toward Douglas Park (**Figure 15**). The property also enjoys views toward Douglas Park and glimpses over the Hume Highway, Southern Railway and Nepean River margins toward Appin in the vicinity of Ousedale Creek.

Development surrounding the immediate homestead has been minimal. Environmental and rural zoned residences are scattered throughout the view lines, and the Southern Railway and Hume Highway are glimpsed approximately 200 m to the east. State Significant Development Approval has resulted in the greatest change in the form of proximity to an access road, as well as Vent Shaft No .6 and supporting infrastructure beyond vegetation screening to the south. The remainder of the surrounds continue to serve grazing and rural purposes that retain the original rural historical character of the site (**Plate 1**).



Figure 14. Overview of key elements of the present Mountbatten Group (north to top) (Source: Sixmaps with Archive markup).



Plate 1. View line south toward the Mountbatten group with the Stable at centre and the Upper Nepean River catchment in the distance at right. (Source: Archive Heritage)



Plate 2. View north-west toward Spaniard's Hill from the Stable (Source: Archive Heritage)

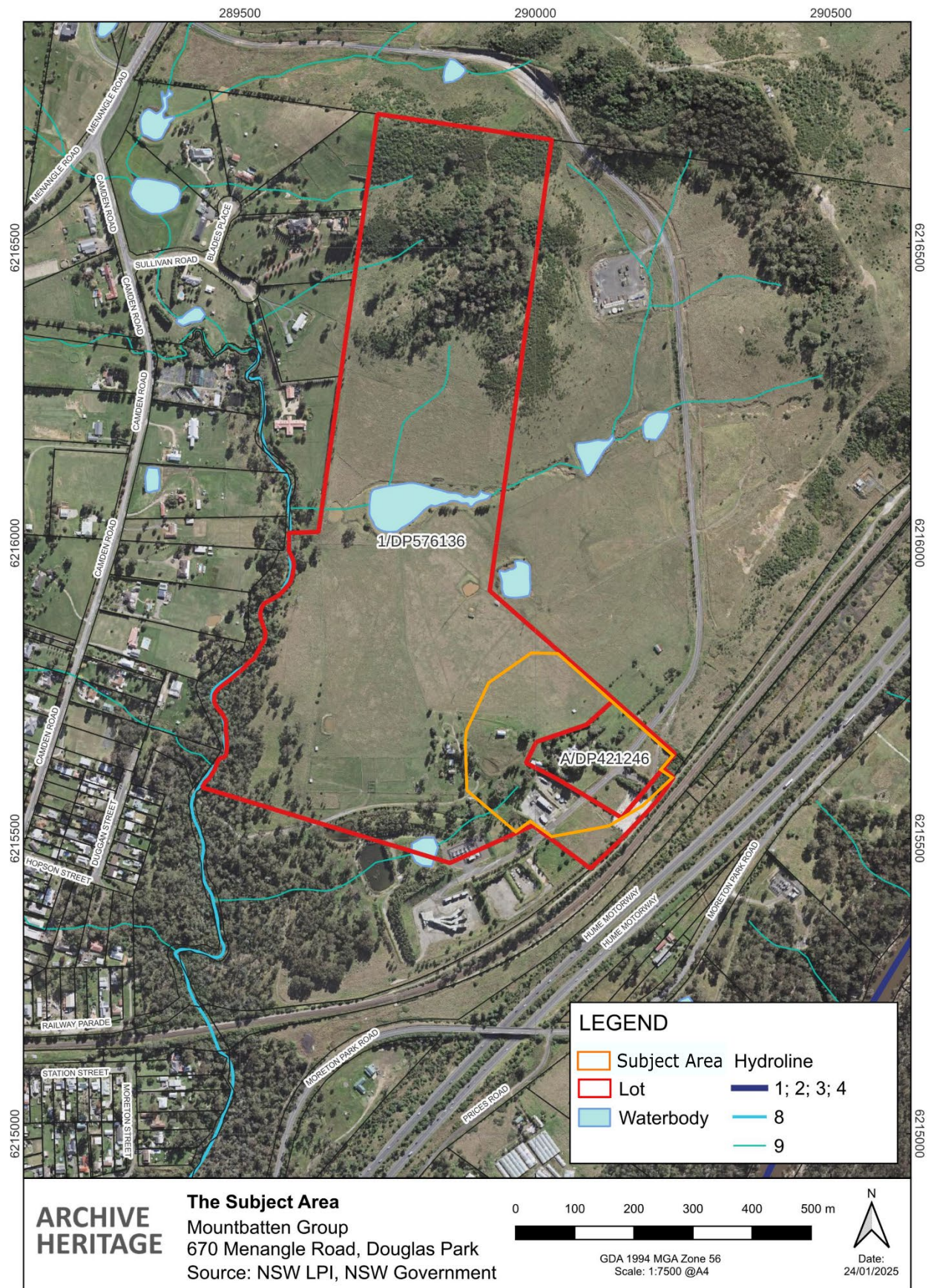


Figure 15. Location of the subject area within Douglas Park, NSW (Source: Archive Heritage).

3.3 THE GROUNDS AND GARDEN

The following section presents a description of the components of the grounds and gardens. The relative significance of the various elements of the grounds and garden are assessed in **Section 4**.

3.3.1 ACCESS ROADS

The property has been approached from several routes over time, beginning with De Arrieta's track shown in **Figure 6** as well as a road subsequently taken from Douglas Park. The current short drive off the Vent Shaft 6 access road has been in place since at least the 1940s when the Terpening's remodelled Morton Park as the Mountbatten guesthouse. This drive once extended further east toward the railway line and trees present in **Figure 13** suggest this was the access route utilised following ownership under the McMullens and the advent of the railway. This leads to a long-standing figure-of-eight carriage circle to the front (east) of the Main House.

The sandstock brick bordered carriage circle formed part of a longer circuit drive around the homestead itself- an elaborate feature of a neatly planned garden featuring select trees and crescentic low hedge boundaries framing the encircling drive.

3.3.2 HISTORICAL PLANTINGS

It is likely that much of the garden planting took place during the remodelling of the property under the Terpening's ownership. However, mid-century photographs show that most trees present were already mature at this time (**Figure 13**). These included key European and conifer species that were popular homestead pioneer/shade trees during the 19th century. Examples of such mature specimens at Mountbatten include *Quercus robur* (English Oak), *Cedrus deodara* (Deodar), *Lophostemon confertus* (Brush Box), *Pinus radiata* (Monterey Pine) and Cypress (unidentified sp.). A number of mature native trees are also present including *Ficus macrophylla* (Moreton Bay Fig), *Brachychiton populneus* (Kurrajong) *Melia azederach* (White Cedar) and *Araucaria cunninghamii* (Hoop Pine) (**Plate 7**).

Most of this vegetation was among 300 native tree species that were available during the 1850s from the neighbouring Camden Park Estate nursery of William Macarthur, horticulturist and son of John Macarthur.⁵¹ Taking this into account, together with the slow growth rate that would be expected on the shallow sandstone soils, mature historical plantings around the homestead are considered likely to date back well into the 19th century.

Shrub plantings within the garden are predominantly confined to use as hedges lining boundary fences, the drive and former tennis court. These are limited to several invasive and spreading species, including *Plumbago auriculata* (Leadwort), *Ligustrum lucidum* (Large-leaved Privet) and *Olea europaea ssp. bicuspidata* (African Olive). Many of these plantings have grown beyond their original area, self-sowing in new locations and have grown to heights that obscure view lines toward and from the heritage item (**Plate 8**).

The estimated ages and position within the garden of key plantings are outlined within **Table 3** and planting phases are shown in **Figure 19**.

⁵¹ Museums of History NSW 2016, *Araucaria Cunninghamii* - Elizabeth Farm, <https://mhnsw.au/stories/florilegium-plants/hoop-pine/>

3.3.3 GARDEN BUILT FABRIC

Built elements within the garden setting include a below ground brick cistern/tank, the terraced flat of a former tennis court, a circular brick and terracotta tiled dovecote (pigeon house) and several sandstone grave markers or pet memorials with plaques (**Plate 15** and **Plate 13**).

The dovecote is the structure referred to elsewhere as the aviary⁵² and 'garden building'.⁵³ Dovecotes of this style were features of aristocratic homes from the earliest phases of colonial Australia and the roof tiles of this example are handmade and consistent with others in use during the first half of the 19th century.⁵⁴ However, the masonry of this example is of a later date, being made of mass-produced bricks and a cement render and likely built during Phase 3.

The large, approximately 20,000 litre capacity cement rendered cistern was likely built during Phase 2b (c.1860-1914) and later modified under Stanley Haddin's Phase 3 ownership, as he is recorded as sourcing pumped water from the Nepean in 1933.⁵⁵



Plate 3. View east from the front verandah toward the carriage loop and entrance drive. (Source: Archive Heritage).

⁵² GB&A 2012; Niche 2020.

⁵³ State Heritage Inventory 2020, Mountbatten Group - House, Chapel and Garden Building, <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2690086>

⁵⁴ Cottage Green site, Montpelier Retreat, Hobart - Nipaluna excavation report. Final report prepared by Austral Tasmania Pty Ltd for Sultan Holdings Pty Ltd.

⁵⁵ 1933 "MORTON PARK.", Illawarra Mercury (Wollongong, NSW: 1856 - 1950), 31 March, p. 4., viewed 29 Jan 2025, <http://nla.gov.au/nla.news-article132901399>



Plate 4. View west back toward the front verandah (Source: Archive Heritage)



Plate 5. View north toward the Main House showing mature Moreton Bay fig trees flanking the drive (Source: Archive Heritage).



Plate 6. View north across the former tennis court showing border plantings. (Source: Archive Heritage)



Plate 7. Self-sown African Olive trees beyond the formal plantings (Source: Archive Heritage).



Plate 8. Mature Hoop Pine north of Main House complex (Source: Archive Heritage)



Plate 9. 20th century dovecote (Source: Archive Heritage)

Table 3. Identified contributory garden elements and their estimated phase of introduction

Garden Element	Likely Phase of Planting	Position in the garden
Carriage drive and figure-of-eight terminus	Phase 2 (1856-1914)	Partially encircles house from direction of Douglas Park
Brick lined cistern	Phase 2 (1856-1914) with Phase 4 modifications	South-west of the Kitchen building and adjacent to the garage

Garden Element	Likely Phase of Planting	Position in the garden
<i>Pinus radiata</i> (Monterey Pine).	Phase 2 (1856-1914)	Lines former drive east of the Vent Shaft 6 access road
<i>Quercus robur</i> (English Oak)	Phase 2 (1856-1914)	Lines one side of the drive into the property
<i>Cedrus deodara</i> (Deodar)	Phase 2 (1856-1914)	Lines one side of the drive into the property
Cypress (unidentified)	Phase 2 (1856-1914)	Flanking front of house
<i>Ficus macrophylla</i> (Moreton Bay Fig)	Phase 2 (1856-1914)	Lining drive on southern side of the Main House
<i>Melia azederach</i> (White Cedar)	Phase 2 (1856-1914)	North-west of Main House
<i>Araucaria cunninghamii</i> (Hoop Pine).	Phase 2 (1856-1914)	North-west of Main House
Brick masonry and terracotta tiled dovecote	Phase 3 (1914-c.1960)	North-west of Main House
<i>Olea europaea ssp. bicuspidata</i> (African Olive)	Phase 3 (1914-c.1960)	Throughout boundary lines of property and self-sown on periphery of plantings
<i>Lophostemon confertus</i> (Brush Box)	Phase 3 (1914-c.1960)	Centre of eastern figure-of-eight- carriage circle
<i>Washingtonia robusta</i> (Mexican Fan Palm)	Phase 3 (1914-c.1960)	Plantings north of carriage circle and around sunken area of former tennis court
<i>Ligustrum lucidum</i> (Large-leaved Privet)	Phase 3 (1914-c.1960)	East of carriage circle
<i>Brachychiton populneus</i> (Kurrajong)	Phase 3 (1914-c.1960)	Between drive and house on southern side of Main House
<i>Corymbia citriodora</i> (Lemon-scented Gum).	Phase 3 (1914-c.1960)	South-west of Main House
<i>Plumbago auriculata</i> (Leadwort).	Phase 3 (1914-c.1960)	Forming a dense, tall screen beneath Moreton Bay Figs lining southern side of Main House
Sunken flat of former tennis court	Phase 4 (c.1960-Present)	North-east of Main House
Sandstone pet memorials and plaques	Phase 4 (c.1960-Present)	East of carriage circle and west of Hoop Pine
<i>Philadelphus coronarius</i> (Mock Orange)	Phase 4 (c.1960-Present)	Beside timber porch on south side
<i>Prunus</i> sp. (Plum)	Phase 4 (c.1960-Present)	Beside timber porch on south side
Climbing roses and Wisteria	Phase 4 (c.1960-Present)	Within garden beds flanking main entrance to Mountbatten House
<i>Agapanthus africanus</i> (Nile Lily)	Phase 4 (c.1960-Present)	Among tall screen beneath Moreton Bay Figs on southern side of Main House
<i>Schefflera actinophylla</i> (Umbrella Plant).	Phase 4 (c.1960-Present)	South-west of Main House
<i>Jacaranda mimosifolia</i> (Jacaranda)	Phase 4 (c.1960-Present)	North-west of Main House

Garden Element	Likely Phase of Planting	Position in the garden
<i>Nerium oleander</i> (Oleander),	Phase 4 (c.1960-Present)	North-west of Main House
<i>Cedrus deodara</i> (Deodar),	Phase 4 (c.1960-Present)	North-west of Main House
<i>Phoenix canariensis</i> (Canary Islands Date Palm),	Phase 4 (c.1960-Present)	North-west of Main House
<i>Buddleia davidii</i> (Butterfly Bush),	Phase 4 (c.1960-Present)	North-west of Main House

3.4 MAIN HOUSE COMPLEX

3.4.1 ARCHITECTURAL STYLE

The house is a brick, sandstone and timber structure with a hipped, slate roof and tall chimneys (**Plate 10**). It is typical of the Victorian Georgian style of 'reasonably proportioned', unsophisticated symmetry that enhanced the earlier Georgian model. With improvements in manufacturing the style introduced a greater proportion of glass, slate and corrugated iron rooves and turned timber elements.⁵⁶ The enclosed rear Courtyard of clean sandstone is virtually unchanged from the earlier Georgian period- framed by sash-windowed functional outbuildings in use prior to the later adoption of first floor Bedrooms and interior kitchens, washrooms and water sources. Houses of this style were ubiquitous over the middle third of the 19th Century particularly across the rural landscape.⁵⁷

The Main House complex has undergone substantial alteration over time through extensions and in response to the advent of electrification and indoor plumbing and in order to replace and reconstruct deteriorated original fabric. These changes are discussed throughout this Section in terms of the 4 identified phases of development outlined in **Table 2** and **Table 3**. The layout of the Main House complex is presented in **Figure 16**, and a phased overview of the complex presented in **Figure 19** at the end of **Section 3.6.3**.

Significant alterations have been carried out within the interior in particular. However, the majority of the masonry of the Main House, the South Wing of the Courtyard and rear Kitchen are considered to all derive from the initial phase of construction (Phase 2a) between the years 1856 and c.1858. In this regard, Mountbatten (Morton Park) House retains much of the character, if not extensive interior fabric, of its original construction. The architect responsible for the floorplan and detailing is not known.

⁵⁶ Apperly, R, Reynolds, P. L & Irving, R 1989, A Pictorial Guide to Identifying Australian Architecture: Styles and Terms from 1788 to the Present, Angus & Robertson, p.42.

⁵⁷ Ibid.



Plate 10. Front entrance façade of the Main House (Source Archive Heritage)



Plate 11. View south along front verandah (Source Archive Heritage)

3.4.2 EXTERIOR FORM AND FABRIC

Front Façade

The relatively recent (Phase 3) timber verandah (**Plate 11**) provides a double front to the building, wrapping around the eastern and southern elevations that form the main façade. Beneath the decking evidence of a previous porch is present including older reused joists and disused brick and stone support pads (**Plate 12**).

The slanted verandah roof of aged, corrugated iron supported by turned timber columns is likely a 1940s (Phase 3) replacement of an original and features painted tin guttering consistent with the rest of the house.

In keeping with the more open, light-filled Victorian model, the combined eastern and southern verandah facades feature a total of seven glass panelled French doors, however these feature later, Phase 2a or Phase 3 glazing (**Plate 26**). These are currently boarded over. Three of these once opened onto the southern verandah from three rooms. At the front of the house four sets of French doors open onto the verandah from two rooms. Each set of French doors once had a double set of louvred timber shutters, a period feature of other Georgian/Victorian residences. Only one of these sets remains in place. These frame the central front door, a heavy, four-panelled, bolection moulded door with a centrally fixed, moulded brass knob (**Plate 24**). The front door sidelights feature fielded panels and a large three-part highlight is set over the top of the door. The rim lock and hardware is considered original, however the glazing replaces earlier lights.⁵⁸

The ends of the verandah about Phase 3 additions built in either cinder block or brick. These walls modify the original open-sided design of this type of verandah (**Figure 9**). These end walls are affected by mould and the render and possibly also the masonry, is separating from the wall fabric of the Main House.

At the south-western end of the verandah sections of render are coming away with movement of the masonry, exposing brickwork and fresh (well-preserved) bedding mortar of impure clay and coarse sand. (**Plate 14** and **Plate 15**). The bricks used are of a weak, low-fired fabric. They may have been mass-produced on one of the wet press machines that began entering the Australian brickmaking industry during the 1850s⁵⁹ but may also be handmade as they exhibit poor face and arris quality.

Where visible through inspection pits within the interior floor, brick masonry was observed to be set on at least three courses of well-shaped and fitted sandstone block footings set with sandy clay mortar (**Plate 13**), beneath a dressed sandstone top course foundation that supports the English bond brickwork. Unusually, at least part of the timber floor as also set on robust sandstone footing bearer walls that have been partially removed in places to accommodate later plumbing and wiring.

The house is likely to have always been rendered and limewashed to protect the soft brick, as is also evident for other houses of the period (**Figure 9**). The exterior quicklime render is visible in damaged sections (**Plate 14** and **Plate 15**) and was seen to underlie surface paint and be consistent with traditional techniques comprising:

1. a traditional mortar render of 'impure' coarse sand, clay, quicklime, straw and hair fibre, charcoal, ash, and possibly gypsum, beneath
2. a coarse pinkish lime putty 'float', beneath
3. one or more finer, likely also pigmented limewash 'set' layers.

The render has been jointed with ashlar detailing to imitate more refined Georgian ashlar render work, itself a mimicry of stone masonry (**Plate 11**). This is also the case for render throughout the Main House complex, including on the chimneys, arch wall and also the cottage outbuilding (**Section 3.5**). All renders of the Main House complex appear to be over-painted. The current front façade render may have been

⁵⁸ GB&A 2012, p.36.

⁵⁹ Wright, S. 2015, Hobart Brick Heritage, Proceedings of FABRIC: The Threads of Conservation, Australia ICOMOS Conference November 2015.

entirely re-applied using traditional techniques during major restoration works carried out during the 1980s.⁶⁰ However, well-made and applied lime render may last for centuries, requiring only repeated limewash 'set' finishes. The render of the front façade is considered no older than the Phase 3 extensions at either end of the verandah which underlie the present render.

The wall at the southern end of the verandah forms one side of the Phase 2b (1860-1914) Bathroom 4 extension. This bathroom forms an en-suite to one of three adjoining rooms of a southern wing accessed from an internal Courtyard. Bathroom 4 has also had a small, one-room laundry with a concrete floor tacked on to its southern wall that is likely to have been built for this purpose, or as a storeroom during Phase 3 (1914-c.1960) or Phase 4 (c.1960-Present) (**Plate 16**).



Plate 12. Disused timber support pad materials from previous phases of decking (Source: Archive Heritage)



Plate 13. View of well-formed sandstone footings beneath interior floor (Source: Archive Heritage)

⁶⁰ GB&A 2012, p.36.



Plate 14. Fallen render and exposed masonry (Source: Archive Heritage)



Plate 15. Detail of render and mortar (Source: Archive Heritage)

South-Eastern Elevation

Immediately to the south, the garden entrance to the rear Courtyard has been enclosed by a masonry wall featuring three minor arches, each in-filled with painted metal palisade gates (**Plate 16**). The wall abuts both the Phase 2b and Phase 3 South Wing extensions and the Phase 2a Kitchen (described below). The arched wall is sealed in cement render that is ashlar jointed on the support pillars. Enough render has fallen away to indicate that the structure is formed of later bricks than the Main House complex and there are indications concrete cinder blocks may form part of the pillars. It is likely that the arch wall was constructed during Phase 3, at a later date than the secondary Courtyard entrance (described below)

To the west this wall adjoins a rock-faced sandstone extension to the Kitchen, likely a room anecdotally referred to as a meat-curing room during Phase 2b.⁶¹

⁶¹ Lynch, C. 2017, Oral History.



Plate 16. Phase 3 masonry arch wall exterior with the 20th century laundry addition at right (Source: Archive Heritage)

Courtyard

The Courtyard enclosed by the arch wall and rear buildings is paved with irregular sandstone pointed with cement render. A sandstone millstone and paving slab cover a sandstone framed cistern opening set into the Courtyard (**Plate 17**). This is likely the first water source for the property and may have been built for De Arrieta during the 1820s. A hand pump patented in 1842 was once set into the millstone.⁶²

A secondary north-western entry to the Courtyard is via a door through a 20th Century, parapeted masonry wall rendered in cement (**Plate 18** and **Plate 19**). This wall encloses the gap between the existing North Wing of the Main House and the Kitchen building, passing beneath the roofline and keyed into the north-eastern corner of the latter.

A verandah lines the buildings facing into the Courtyard that is supported by recently added metal posts. The roof of this verandah is corrugated iron with a timber boarded soffit lining.

The Courtyard-facing, eastern façade of the sandstone Kitchen building has been recently repointed with Portland sandy mortar. The 6-pane hung windows are set between flush sandstone lintels and sills and the Kitchen has two heavy wooden doors at either end. The sandstone blocks of the Kitchen are neatly jointed and dressed with minimal mortar bedding and show evidence of having been recently sand blasted back to a clean finish.

The opposite elevations of the south and North Wings of the Main House are rendered with brick sill courses under original 6-pane and 4-pane sash (hung) windows featuring cylinder glass produced during the mid-19th century (**Plate 37**).

⁶² Stirling, W. 1984, p.12.



Plate 17. Sandstone framed cistern opening set into the Courtyard and former millstone (Source: Archive Heritage)



Plate 18. View west across the Courtyard (Source: Archive Heritage)

Western Elevation

The western elevation consists of the former drive encircling the exterior of the Kitchen building and the parapet wall, with its 20th Century timber door (**Plate 19**). The Kitchen is apparently the first building constructed for the Hughes in 1856. It is formed of large, rock faced sandstone blocks, with cramping iron divets visible on the exterior. The hipped roof has been reclad in corrugated iron with later 'ogee' pattern guttering.⁶³ Narrow eaves are lined in timber boards with a timber fascia.

The western elevation includes the substantial exterior sandstone chimney of the Kitchen, the crown of which is detailed in a broadly similar way to those of the Main House.⁶⁴ The chimney has been identified as having undergone past tilting and rotation, cracking and separation from the Kitchen building (**Plate 20** and **Plate 21**).⁶⁵ Ongoing monitoring of the chimney by IMC Surveyors for ICHPL indicates that it has undergone negligible movement in recent years.

⁶³ GB&A 2012, p.38.

⁶⁴ Ibid.

⁶⁵ Inglis 2017.



Plate 19. View south-east toward the western elevation of the Kitchen and attached Courtyard wall (Source: Archive Heritage)



Plate 20. Tilted chimney seen from the north (Source: Archive Heritage)



Plate 21. Cracking on the chimney seen from the south (Source: Archive Heritage)

Northern Elevation

The exterior of the original North Wing has rendered walls and sill courses beneath Phase 4 gutters, roof and downpipes. A notable difference here are the windows, which are all set within reveals of varying dimensions and are boarded up on the exterior.

To the east the elevation becomes irregular in profile; a result of substantial, piecemeal Phase 3 extension of the interior spaces (**Plate 22**). A former Phase 4 timber deck in this area has been removed. At its eastern end, the extension wraps around to meet the front verandah of the house as described at the start of this Section.



Plate 22. View southeast toward the northern elevation (Source: Archive Heritage).

3.4.3 INTERIOR FORM AND FABRIC

Main House

The 1858 building has a long history of alterations, culminating in a series of restoration works carried out in the late 1980s.⁶⁶ These works were in keeping with the original style, however the result is that the house features eclectic signs of past development (**Plate 22** and **Plate 23**) and many original internal finishes have been replaced, affecting the architectural character of the interiors and function of many rooms. The present function of rooms within the Main House are illustrated in **Figure 16**.

The full-length Entrance Hall (**Plate 24**) is centrally divided by a simplified Georgian hall arch and displays the original 12-foot ceiling heights. Wall surface fabrics were seen to be a mix of painted and concealed render and later plasterboard and tiles introduced during Phase 4 renovations,⁶⁷ Ceilings appear to also be a mixture of older plaster and recent plasterboard additions (**Plate 25**). Where sections of these have been removed, recent timber members are seen supporting lath and plaster impressed original ceiling joists,

Floors are constructed of a mix of older, hardwood tongue and groove boards fixed with rectangular headed nails or brads and later boards introduced after 1940 (**Plate 27**). All floorboards and the

⁶⁶ GB&A 2012

⁶⁷ GB&A 2012, p.37.

majority of timber architraves and skirting boards are likely to be replacements of original woodwork. Timber architraves and skirting featured wide, classical profiles although there is a variety of mouldings that reflect the various phases of introduction and replacement.

Plasterboard cornice mouldings used are consistent with traditional wide profile 'run' plasterwork. No original plaster corning appeared to remain. These would have come away with the original ceiling and all current cornices are likely to have been added since the 1940s northern extension (**Plate 26**).

To the right of the front door is a heavily modified 'Lounge Room' (probably originally the 'Drawing Room') (**Figure 16**), the northern wall of which has been removed and replaced with the Phase 3 extension that sits beneath a broad, bulkhead ceiling (**Plate 26**). A large conifer grows close to the north-east of this extension. The interior of this part of the house does not show evidence of foundational movement from this tree. However, substantial cracking is evident elsewhere throughout the interior, including at the eastern end of this Phase 3 extension beneath an area of missing chimney flashing over Bedroom 1. Water infiltration is considered the most likely source of masonry cracking, with foundational movement a secondary contributing factor.

A Phase 3 marble fireplace surround had been covered over at the time of the inspection and the room's French doors were also boarded up.

On the opposite side of the hall the 'Dining Room' (probably originally the reception room or 'Parlour') fireplace had also been covered over, and no fireplace surrounds within the house are original.⁶⁸ Doors within this room may retain some of their original surrounds and architraves. In contrast, the main Bedroom has been completely altered through removal of the original doorway and entire northern external wall and the addition of a 20th Century ensuite bathroom, new arched entry and new partition wall and door. At the modified entrance to the Bedroom the transition between the older pre-extension floor and post extension flooring is evident (**Plate 27**).

The 20th Century 'Kitchen' has also been heavily altered, retaining only the original sash window and French Door. This room is likely to have originally been a Dining Room prior to the introduction of electricity and internal plumbing during Phase 2a.

⁶⁸ Ibid.



Plate 23. Courtyard doorway and altered window reveals at the back of the Main House. Failing flashing and eaves are visible (Source: Archive Heritage)



Plate 24. Centre of the Entrance Hall showing arch, front door and glazing (Source: Archive Heritage)



Plate 25. 20th View north of the Dining Room showing ceiling damage (Source: Archive Heritage)



Plate 26. View north through the living room showing bulkhead of northern extension (Source: Archive Heritage)



Plate 27. Transition between flooring at entrance to Bedroom 1 (Source: Archive Heritage)

South Wing

Due to the extensive use of render it is not entirely clear when the South Wing was added to the complex. The roofline indicates that the first two rooms – now the heavily modified 'Store' room and 'Bathroom 3' (**Figure 16**) are likely an original return of an 'L' shaped house.

The Store features the final set of French doors opening onto the verandah. Some of these doors have previously been identified as 'original' however their date of introduction is not clear.⁶⁹ This example features patterned etching that was popular during the Art Deco period. Further, all French doors feature smooth glazing that appears to be either industrial cylinder glazing introduced after c.1870 or possibly even float glass introduced after c.1940. As the walls are rendered, it is not possible to determine whether they may have replaced earlier sash windows. The introduction (or simply reglazing) of most of these doors may date from anywhere between c.1870 and the mid-20th century.

The roofline of the 20th century Bathroom 3 indicates this room once had a chimney and it is likely to have been a Bedroom.

The final rooms to the west appear to be a later 19th century extension. The tacked-on skillion roof of Bedroom 5 and Bathroom 4 is framed by masonry parapet walls – a typical convention of the slightly later Victorian Regency period.⁷⁰ These rooms feature original sash windows and timber doors (**Plate 29 and Plate 30**). An internal door connects the two rooms and both have been altered from their original conditions. A timber floor has been fitted to Bedroom 5 and a vitrified clay greywater riser has been

⁶⁹ GB&A 2012, p.36.

⁷⁰ Apperly et. al., 1989, A Pictorial Guide to Identifying Australian Architecture.

removed and levelled in order to install the floor. This change suggest that the room may originally have been a bathroom fitted with a bath or other drain. The attached, smaller Bathroom 4 has a ceiling lined with timber boards; a feature also seen in the North Wing.



Plate 28. View south-east of the start of the South Wing. Failed roof plumbing is seen at junction (Source: Archive Heritage)



Plate 29. View east toward the later addition to the South Wing (Source: Archive Heritage)



Plate 30. Interior of the Bedroom 5 western extension of the South Wing with original window (Source: Archive Heritage)

North Wing

As with the south, the North Wing contains a series of unconnected rooms, likely former Bedrooms, that were accessed directly off the Courtyard (**Plate 29** and **Plate 32**). The wing is clad with the same iron roof that covers the 1940s northern extension of the Main House. The roofline of this wing may have always rested beneath the eaves of the adjacent slate roof of the Main House as it does now and the North Wing is therefore likely a Phase 2b extension (c.1860-1914), as with the western end of the South Wing described above.

Fallen render in the westernmost room has revealed early bricks bonded with a dark, soft shell lime mortar (**Plate 34**). A reasonable case has been made for the argument that the masonry of this building may predate the Main House,⁷¹ however due to the separate roofline it is more likely that the North Wing was added on to the Main House soon after its construction during Phase 2b. Confirmation of this is prevented by the fact that the entire wing is rendered and painted and the rooms have undergone various alterations including the removal or concealment of some of the original fireplaces (**Plate 35**) though each chimney remains on the roof.

The Bedrooms are set under a pitched roof with raked ceilings along the northern edge. Timber boarded ceilings consistent with those seen in Bathroom 4 in the South Wing have been sheeted over during concurrent changes during the 1940s (**Plate 33**).

East of the two end Bedrooms a third has been converted into a laundry (**Plate 36**) and a large Phase 3 bathroom forms the junction with the former master Bedroom of the Main House (**Plate 38**). A variety of

⁷¹ GB&A 2012, p.37.

sash windows are present, with original, early cylinder glass examples lining the Courtyard wall (Plate 37).



Plate 31. View west along front of the North Wing (Source: Archive Heritage)



Plate 32. Interior (facing west) of the westernmost room of the North Wing (Source: Archive Heritage)



Plate 33. Timber board ceiling in Bedroom 4 (Source: Archive Heritage)



Plate 34. Early bricks and mortar beneath painted render in Bedroom 4. (Source: Archive Heritage)



Plate 35. Original fireplace bricks in Bedroom 3



Plate 36. Concealed fireplace and 20th century floor in the laundry (Source: Archive Heritage)



Plate 37. Warped, mid-19th century cylinder glass in an original Bedroom 3 window (Source: Archive Heritage)



Plate 38. Phase 3 Bathroom 2 (Source: Archive Heritage).

Sandstone Kitchen Building

The sandstone Kitchen has undergone several major alterations from its original appearance however it retains much of its character as a working Kitchen and as the oldest confirmed structure of the Mountbatten (Morton Park) Main House complex.

As with the eastern exterior (**Plate 39**), the interior walls comprise cleaned-back sandstone face blocks, repointed with a grey cement composite mortar that is incompatible with the age and fabric of the walls. The Kitchen is a single space with the meat curing addition entered through the south wall.

The sandstock brick and sandstone chimneyed fireplace was the hearth of all family and guest cooking until the latter 19th century (**Plate 40** and **Plate 41**). It supported a spit roast⁷² and domed sandstone baking ovens were set into either side of the hearth where bread, cakes and vegetables would have been baked on pre-heated plate iron behind a wooden or iron door. These have since been converted into wood boxes. Carved into a rendered sandstone crown panel over the fireplace is the inscription 'Enough and to Spare AD 1865'. The hearth is rendered, with the render exfoliated from heat. The stone surround is an example of the Gothic Revival style popular from the mid-19th century. The heat affected render has been applied to both the inner surround and original brickwork and it is evident the surround has been in place throughout decades of use of the fireplace and recently repainted. The surround has been painted to replicate the smooth, yellow tone of traditional English sandstones such as York stone and is almost certainly a Phase 3, post-1940s addition.

The timber floors, faux Tudor window reveals and coffered ceiling (**Plate 42**) may also date from the c1940 phase of development⁷³ when the Kitchen was converted into an "Entertainment Room". It was largely known for this purpose throughout the remainder of the 20th century and the Kitchen was

⁷² Lynch, C. 2017, Oral History.

⁷³ GB&A 2012.

probably first used for this purpose by the McMullen's, who dedicated a large space as a ballroom in the latter 19th century.



Plate 39. The symmetrical exterior (Courtyard) façade of the sandstone Kitchen (Source: Archive Heritage)



Plate 40. Replica York stone gothic revival fireplace surround and side ovens, now wood boxes. The inscribed 1865 panel can just be seen above (Source: Archive Heritage)



Plate 41. Detail of the fire bricks used beneath the cracked render (Source: Archive Heritage)



Plate 42. Phase 3 windows and coffered ceilings, with the meat curing addition at left (Source: Archive Heritage)

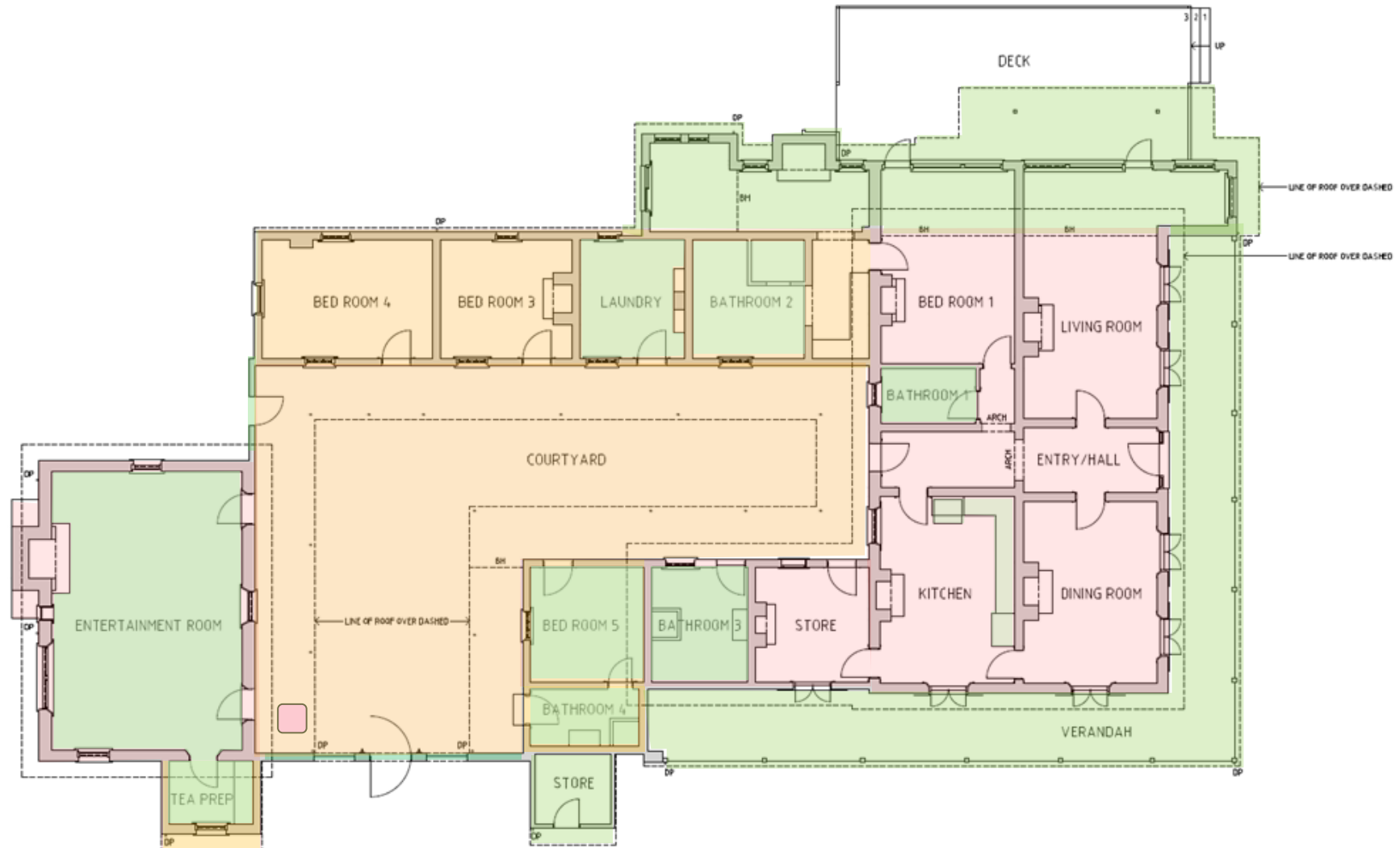


Figure 16. Floor plan of the current configuration of the Main House complex. Pink indicates original construction during Phase 2a (c.1856-c.1860), orange Phase 2b additions (c.1860-1914), green Phase 3 (c.1915-1930), yellow Phase 4. The Phase 4 deck has been recently removed (Source: GBB Architects for Illawarra Coal Holdings 2012 with Archive mark-up)

3.4.4 CONDITION AND INTEGRITY OF THE MAIN HOUSE COMPLEX

The deterioration of many parts of the Main House has been well-documented in previous CMPs.⁷⁴

In addition to observations made during the current site inspection, the following assessment of condition and structural integrity is informed where relevant by these observations and independent structural engineering assessment conducted for the Main House complex on behalf of South32.⁷⁵ Criteria for condition ratings used are outlined in **Table 4** and a revised condition and integrity assessment is provided below in **Table 5**.

Table 4 Definitions and classifications of the condition and integrity of structural fabric

Structural Element	Condition Rating	Definition
Sandstone Foundations	Good	Well-bonded, Stable and dry footings/foundations.
	Fair	Well-bonded, Stable but damp foundations.
	Poor	Poorly bonded, damp and soft, degrading sandstone requiring underpinning/replacement to prevent further compromise of structural integrity.
Sandstone Masonry	Good	Well-shaped, fitted and pointed stonework.
	Fair	Well-bonded stonework requiring repointing.
	Poor	Degraded stonework exhibiting cracking, exfoliating and/or loss of mortar and requiring repair/reconstruction to prevent further compromise of structural integrity.

⁷⁴ GB&A 2012.

⁷⁵ Structural Assessment Report South32: Mountbatten House – Main House, Vent Shaft #6 Road Douglas Park, NSW

Structural Element	Condition Rating	Definition
Exterior Brick Masonry	Good	Well bonded face bricks or rendered masonry, free of cracking.
	Fair	Face bricks showing signs of render/mortar loss or fabric deterioration, free of cracking or exhibiting minor cracking (< 5mm in width).
	Poor	Face bricks showing extensive render/mortar loss, movement, moisture, bowing, fabric shedding or extensive cracking (>5mm in width) and requiring repair/reconstruction to prevent further compromise of structural integrity.
Wall Renders	Good	Well adhered render and complete float and set limewashes using traditional, breathable mortar fabric. Overpainting likely to be present and inhibiting original render porosity.
	Fair	Aged, cracking or exfoliating renders of traditional, breathable fabric beneath overpaint.
	Poor	Failing traditional mortar due to age, inappropriate thickness/adherence. Effects of overpaint and moisture. Inappropriate, non-porous cement renders.
Interior Brick Masonry	Good	Well bonded face bricks, sandstone or rendered masonry, free of cracking or hairline cracks only.
	Fair	Face bricks showing signs of render/mortar loss or fabric deterioration, free of cracking or exhibiting minor cracking (< 5mm in width.)
	Poor	Face bricks showing extensive deterioration such as render/mortar loss, movement, moisture, bowing, fabric shedding or extensive cracking (>5mm in width) and requiring repair/reconstruction to prevent further compromise of structural integrity.
Roofing	Good	Intact and complete roofing (slate or corrugated metal). Flashings, gutters, downpipes, eaves, soffit and fascia all in good condition.
	Fair	Roofing exhibiting some wear/rust. Aged but functional flashings, gutters and downpipes, eaves, soffit and fascia requiring cleaning/painting.

Structural Element	Condition Rating	Definition
	Poor	Roofing exhibiting missing slate/ metal corrosion requiring repair/replacement. Damaged or missing flashings, gutters and downpipes, missing or deteriorated eaves, soffit and fascia requiring replacement to prevent further compromise of structural integrity.
Interior Roof Cavity Members	Good	Adequate and well-secured rafters and joists in solid condition.
	Fair	Rafters and joists in stable, aged condition.
	Poor	Damaged/rotting rafters and joists with active termite and/or moisture damage. Slumping and failing roof members requiring repair/replacement to prevent further compromise of structural integrity.
Interior Architraves, Reveals and Skirting	Good	Intact, solid and dry plaster or timber mouldings.
	Fair	Split or damaged mouldings in Stable condition.
	Poor	Damp/rotting plaster or timber or termite ravaged timber.
Timber Floors	Good	Dry, solid and intact flooring and joists/bearers.
	Fair	Flooring joists and bearers in aged but Stable condition.
	Poor	Damp/rotting and/or termite damaged flooring, joists and bearers requiring repair/replacement to prevent further compromise of structural integrity.
Tiled/ Stone Surfaces	Good	Intact, well levelled and jointed tiling/flagging/setts/paving.
	Fair	Aged but largely intact, tiling/flagging/setts/paving.
	Poor	Damaged/failing tiling, Damaged/displaced stone resulting in unusable surfaces.
Windows and Doors	Good	Glazing, framing and hardware whole and in Stable condition.
	Fair	Aged glazing, framing and hardware requiring some degree of rejuvenation.

Structural Element	Condition Rating	Definition
	Poor	Damaged, rotting wood, broken glazing, missing hardware.
Ceilings and Cornices	Good	Dry, intact and undamaged plasterwork.
	Fair	Damaged, aged plasterwork requiring some degree of rejuvenation.
	Poor	Failing, missing plasterwork requiring replacement.

Table 5 Assessment of the condition and integrity of built fabric within the Main House complex.

Fabric/Element	Condition	Observations
Brick masonry (exterior)	Fair to Good	Main House: Brick masonry is generally concealed beneath external render exposed external brickwork shows early, weak bricks in good condition with bedding/pointing mortar intact. Exterior walls of the Main House are reasonably true and exhibit few cracks. The chimney of Bedroom 1 is missing flashing and brickwork is slightly eroded at the junction of chimney and roofing.
	Fair	South Wing: Brick masonry and render exhibits several minor to extensive cracks due to moisture infiltration. These do not pose risk of structural failure.
	Good	North Wing: Brick masonry and render exhibits minor cracks due to moisture infiltration that do not pose risk of structural failure.
	Poor	Arch Wall: Brick masonry and render exhibits minor to severe cracking due to construction technique. Cracking considered to be exacerbated by 'strongback' iron braces. Remediation required but not urgent.
Brick masonry	Fair	Main House:

Fabric/Element	Condition	Observations
(interior)		Internal brick masonry is concealed beneath internal render and plasterboard. Numerous minor to excessive cracks are evident, particularly in the northern half of the house. Cracking is most severe where the original masonry meets the Phase 3 northern extension and is considered caused by a combination of water infiltration, alteration of the northern wall and roofline and the effects of adjacent tree roots on soils and foundations. Multiple wall finishes within the interior may be trapping moisture within masonry and exacerbating wall movement and cracking. Minor deterioration of wall integrity has occurred between an initial 2012 assessment ⁷⁶ and this CMP, however ongoing weatherproofing issues pose significant risk of accelerated deterioration.
	Fair	South Wing: Brick masonry and render exhibits numerous minor cracks due to moisture infiltration that do not pose risk of structural failure.
	Fair	North Wing: Interior walls are concealed with render however no exterior indications of deteriorating masonry were evident. Internal render shows evident water damage that would cause deterioration of masonry over time.
Sandstone Masonry (Exterior)	Good to Poor	Kitchen: Well-fitted sandstone walls of the Kitchen are in good condition. Recent repointing will aid long-term integrity despite being a cement composite mortar that does not have ideal porosity or aesthetic suitability. The exterior Kitchen chimney shows evident signs of separation and rotation from the exterior wall. This process does not pose a risk of imminent failure but requires suitable remediation.
Sandstone masonry (Interior)	Good	Kitchen: Well-fitted interior sandstone walls of the Kitchen are in good condition. Recent repointing will aid long-term integrity despite being a cement composite mortar that does not have ideal porosity or aesthetic suitability.

⁷⁶ GB&A 2012.

Fabric/Element	Condition	Observations
Sandstone masonry (foundations)	Indeterminate	Main House: Minimal sections of sandstone foundations for the Main House that were seen through inspection pits in the timber floor appeared to be in good condition.
Wall renders	Fair to Good	All buildings: Exterior and remaining internal wall renders retain reasonable overall integrity, with some shedding on the southern verandah and associated cracking with masonry. Mortar fabrics identified in these areas are appropriate to the built fabric.
Roofing (slate)	Poor to Fair	Main House: The slate roofing is reasonably well-preserved, however flashings are lifting or missing entirely, gutters are degraded and eaves and fascias are compromised and rotting. Repair required to arrest ingress of water into internal fabric.
Roofing (metal)	Poor to Fair	South Wing: Corrugated iron roofing is adequate, metal downpipes and gutters are rusty and failing, timber verandah members are rotting. Remediation required but not urgent.
	Poor to Fair	North Wing: Corrugated iron roofing is in adequate condition, metal downpipes and gutters are rusty and failing, timber verandah members are rotting. Remediation required but not urgent.
	Fair	Kitchen: Corrugated iron roofing is adequate, no evidence of failure or water damage in interior.
Interior Roof Cavity Members	Poor	Main House: Damaged/rotting rafters and joists throughout due to age, water damage and termite damage. Replaced rafters and joists appear to be in Stable condition though would be susceptible to water damage over time. Slumping and failing original roof joists have triggered remediation in the form of roof propping between floor and ceiling joists. Requires repair/replacement to prevent further compromise of structural integrity.
	Fair	South Wing:

Fabric/Element	Condition	Observations
		Replaced rafters and joists appear to be in Stable condition though subject to water damage over time.
	Fair	North Wing: Replaced rafters and joists appear to be in stable, condition though subject to water damage over time.
Interior architraves, reveals and skirting	Poor to Fair	Main House: Damp/rotting and termite affected timber present in many locations.
	NA	North Wing: No significant fabric present, skirting subject to water damage.
	NA	North Wing: No significant fabric present, skirting subject to water damage.
Timber floors	Fair to Poor	Main House: Flooring joists and bearers in aged and weakened condition. Softened (damp) flooring evident, Replacement of entire floor structure required to make house usable but not urgent. Sandstone Kitchen: Flooring joists and bearers in Fair condition.
Tiled/ paved surfaces	Good	Main House: No significant fabric present, bathroom tiles in fair condition.
	Good	Courtyard: Sandstone paving intact, level, dry and pointed with composite cement mortar.
Windows and doors	Poor to Good	All buildings: Various windows and doors deriving from Phases 2a to 3 in variable condition. Some doors affected by rot, most remain painted, undamaged and unaffected by moisture and termites. All windows and glazing are intact.

3.5 THE COTTAGE

A small building is located approximately 30 m to the west of the Main House that is referred to as the 'Cottage' in previous documents (**Plate 43.** and **Plate 55**),⁷⁷ This structure is an amalgamation of various phases of construction that may span the entire history of the subject area extending back to De Arrieta's Phase 1. These phases are shown in **Figure 17** at the end of **Section 3.5**.

3.5.1 ARCHITECTURAL STYLE

The historical components of the Cottage that hold heritage significance are formed of two overlapping architectural styles, Old Colonial Georgian (1788-c.1840) and Victorian Georgian (c.1840-c.1890). This has come about through the eccentric grafting of a sandstone addition onto an earlier brick building during the middle third of the 19th century. The northern and eastern facades have been rendered and detailed to give the appearance of a more uniform sandstone construction.

The sandstone addition expanded upon a 4m x 4m one-room structure built in sandstock brick bonded with a soft, impure, shell lime mortar (**Plate 45**). In material and style it is typical of small, utilitarian dwellings of the first decades of the 19th century. It may, together with the Courtyard cistern of the Main House, be a remnant of the De Arrieta period of occupation (Phase 1 1822-c.1856). The form, function and fabric place the room firmly within the earliest phase of masonry in colonial NSW between c.1788 and c.1840, by which time mortars and bricks had improved in quality. The absence of more diagnostic features such as nails, domestic refuse or original windows/glazing prevents a more precise estimation of its age. Decorative elements of the sandstone extension are of a Victorian Georgian style common during Phase 2a or 2b (between c.1840 and c.1880) and are likely to have taken place at the same time as, or soon after construction of the Main House.

In taking advantage of the well-constructed brick structure to form a larger one, the sandstone addition has effectively conserved the earlier building (**Plate 46**).

⁷⁷ Niche 2020; GB&A 2012.



Plate 43. Northern elevation of the 'Cottage' (Source: Archive Heritage)



Plate 44. View south-east toward the Cottage showing distance to the Main House seen at left (Source: Archive Heritage)

Brick Room Form and Fabric

The brick room features well-laid though very weak-structured bricks bonded with a very soft mortar of grey clay sand with a minimal aggregate ratio made up of fragments of bone, slate, charcoal and plant fibre (**Plate 49**). At least two firings are represented by the differing red and 'black' bricks that were produced from differing fabric and oxidation (kiln environments). Areas of masonry are actively

'spalling' - disintegrating and accumulating on the floor as a brick-earth powder, a common problem with early handmade, low-fired bricks, particularly in damp or poorly roofed buildings (**Plate 49**).

The room originally had two centrally placed entrances in the north and west walls. Both have been removed by later changes but are recognizable by their 70 cm-wide brick lintels in the straight fan Colonial Georgian style (**Plate 45** and **Plate 46**). These lintels sit at 2.70 m above the current floor level, a height that is 1 m taller than the average 19th colonial cottage doorway. This anomaly is explained by the fact that a 1 m high cellar space exists beneath the modern floor, indicating that the original floor would have sat at a higher level appropriate to both the doorways and a taller cellar space. No evidence of this original floor is evident along the masonry walls. Rather than slotted into the soft masonry, the floor bearers may have been supported by brick or timber pillars spaced across the cellar floor, as the current Phase 4 floor is.



Plate 45. View east from within the sandstone extension into the earlier brick structure (Source: Archive Heritage)



Plate 46. The splicing of the sandstone masonry into the brickwork can be seen at left (Source: Archive Heritage)



Plate 47. North-east corner of the brick structure. Various materials can be seen to have patched damaged areas (Source: Archive Heritage)



Plate 48. Size and form of the sandstock bricks, including shallow, irregular frog, poor facing andarris edge. A probable partial thumb print in the handmade fabric is seen at lower right (Source: Archive Heritage)



Plate 49. Detail of mortar and spalling brickwork (Source: Archive Heritage)



Plate 50. Detail of the mortar of the later stone masonry (Source: Archive Heritage)

The cellar space, accessible through a trap in the timber floor, once had whitewashed walls (still evident) and likely a rendered and washed floor (**Plate 51** and **Plate 52**). No further details could be made out regarding this floor, as it was covered in a slurry and fine powder of brick-earth and accumulated dust. The space currently supports a number of cement bonded brick pillars supporting the timber floor above, of which the central one rests on a stout, square, brick or sandstone masonry block. This central block has a number of rusted, threaded rods embedded in it that once anchored an iron brace plate or similar, likely for a substantial upright member (**Plate 53**). Such base blocks were required in agricultural settings for mechanical hoists and simple Post Mill mechanisms that were turned by animal or human power to grind flour.⁷⁸ It is notable that a relict millstone is present within the Courtyard of the Main House.

A further detail of the original configuration is seen in an apparent infilled area of brickwork in the northern cellar wall (**Plate 54**). This infilled area may denote a former entry similar to the existing doorway of the exterior northern wall, possibly for a barrel ramp. This strongly suggests that a small, semi-basement/half cellar existed prior to extension of the building into a twin cellar space. It is likely these spaces were accessed via the door seen in **Plate 43-Plate 45** following that extension. Alternatively, the space may have originally formed a specific function such as a kitchen, benefitting from below ground thermal insulation and above ground window light. Removal of the interior floor of the adjacent sandstone extension (discussed below) would further inform the development of the overall structure.



Plate 51. View south-west into the cellar subfloor area showing later brick piers supporting the Phase 3 floor (Source: Archive Heritage)

⁷⁸ Jack, S. 2017, Sydney Flour Mills before 1850, The Dictionary of Sydney, https://dictionaryofsydney.org/entry/sydney_flour_mills_before_1850

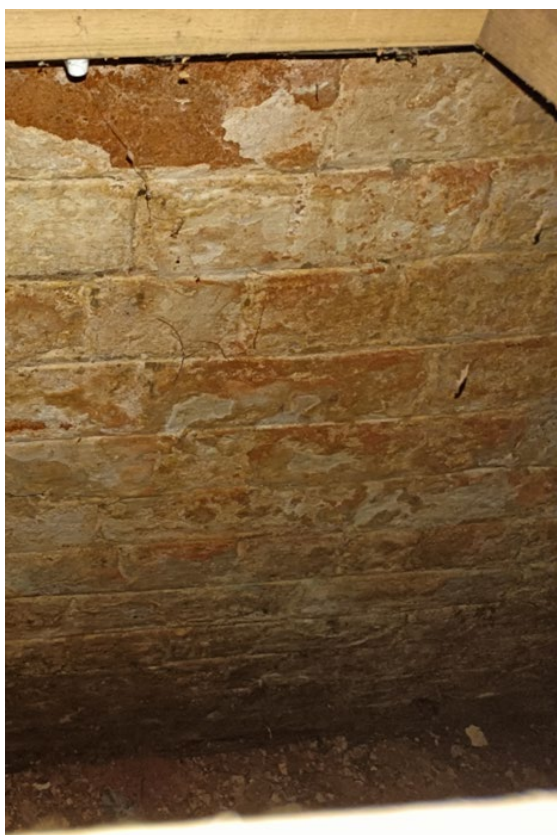


Plate 52. Detail of the whitewashed walls of the cellar in good condition (Source: Archive Heritage)



Plate 53. View north-west into the cellar showing large, central masonry base block with threaded iron fixing rods



Plate 54. Possible original, in-filled entry to the Phase 1 brick building's cellar, seen behind the modern brick floor support pillar (Source: Archive Heritage)

Sandstone Façade and Extension

The sandstone extension to the above brick building features a number of exterior decorative elements within the northern elevation. These include prominent, sandstone window reveals – the eastern one of which is embedded within the brick masonry (**Plate 47**), a bevelled sandstone doorway opening and classically moulded sandstone hood detailing over both windows and doorway (**Plate 55**). The whole is rendered, including the eastern wall of the brick room. A strip of sandstone paving runs along the northern elevation that appears to be a modified original. Sandstone additions on this east wall are limited to a flush reveal, visible from the interior, and a stout sandstone sill. The whole is distinctly characteristic of early Victorian composition.

The central doorway is accessed via a short flight of steep sandstone steps that set the door below the adjacent ground level, as though entering a subfloor space (**Plate 55**). Internally this doorway is set outside the western cellar wall and one third of the doorway is set below the current floor level (**Plate 45**). It is likely that this redundant entrance once accessed a further cellar space west of the load-bearing brick wall via a trap and timber steps set into the interior floor.

The interior sandstone face blocks are hand-picked, well fitted and free of surface alteration. Windows set into the sandstone reveals, including where inserted into the brick walls, are Mid to Late 19th century nine pane and single pane casement windows. The quicklime clay/sand mortar with traditional aggregate inclusions is of an ideal texture, porosity and colour and is likely to be original (**Plate 50**). Mortar is missing from many of the tight joins. The original keying-in of the sandstone addition into the brick walls is clearly visible (**Plate 46**).



Plate 55. View south-west toward the cottage. 20th century first floor additions are visible at left. The area of the possible former cellar entry (infilled) is below the window (Source: Archive Heritage)

20th Century Alterations

Subsequent 20th century change within the building includes a large opening cut into the western brick wall that was then braced by painted, unsquared timber members (**Plate 45**). A further aperture had been opened at the site of the southern door as well and at each join of these openings the damaged brickwork has been pasted over with a rigid, red-tinted cement mortar that detracts from the historical character of the structure.

20th century change has been extensive, This has entailed the Phase 3 or Phase 4 removal of preexisting roofing, the Phase 4 extension of the building to the west on a concrete slab and the addition of an eccentric and ramshackle first floor loft bedroom and bathroom (**Plate 56**). Further 20th century changes include installation of a prefabricated fireplace, large windows and an ad-hoc kitchen within the original brick building (**Plate 46**). A narrow timber verandah has been added to the south elevation of the 20th century addition and a further western fibro extension set on a concrete slab has been removed. The phasing of these changes is outlined in plan in **Figure 17**.



Plate 56. View to the southwest showing the 20th century first floor addition (Source: Archive Heritage)



Plate 57. Interior view of the former exterior junction of brick and sandstone and the 20th century addition with first floor stairs in background (Source: Archive Heritage)

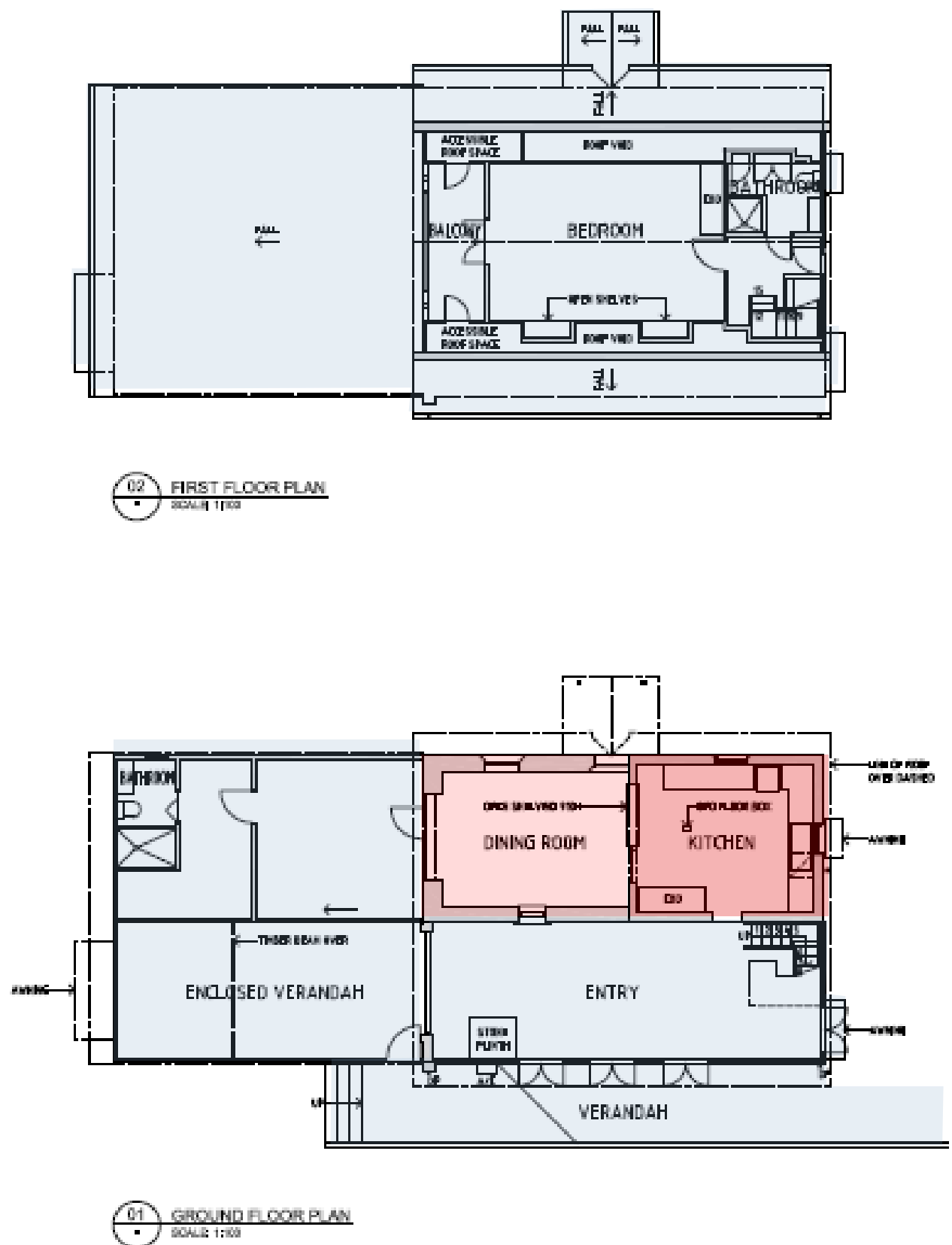


Figure 17. Floor plan of the current configuration of the 'Cottage'. Red indicates possible Phase 1 structure, Pink Phase 2, and blue indicates post 1940 Phase 4 additions. (Source: GBB Architects for Illawarra Coal Holdings 2012 with Archive mark-up).

3.5.2 CONDITION AND INTEGRITY

The deterioration of brick fabric of this age and manufacture is to be expected and the building remains in surprisingly good condition. The original purpose of the brick building is unclear, however it retains clearly retains the character of its early origin. Later 19th century sandstone additions are well-crafted, have preserved the earlier structure and remain in excellent condition. A condition and integrity summary is provided below in **Table 6**. Criteria for condition ratings are outlined in **Table 4**.

Table 6. Assessment of the condition and integrity of built fabric within the Main House complex.

Fabric/Element	Condition	Observations
Brick masonry (exterior)	Indeterminate	Brick Room: The exterior brick masonry has been entirely concealed beneath render and sandstone. The condition of masonry prior to this taking place is not known. The concealment of the face bricks and state of the interior walls would suggest the brick fabric is highly likely to be in a weathered state.
Brick masonry (interior)	Poor to Good	Brick Room: Despite the poor state of several sections of brick wall the majority of interior walls show good integrity and condition, particularly in the damp cellar and including the original mortar. Red-tinted rigid cement mortar and a white composite have been liberally applied as infilling mediums and these detract from the integrity and form of the brick structure.
Sandstone Masonry (Exterior)	Good	North and East Elevations Intact mouldings and reveals remain behind render in good condition. Sandstone paving fronting the north of the building is shifting due to weedy vegetation. This vegetation has been recently cut back to near ground level.
Sandstone masonry (Interior)	Good	Western Extension Well-fitted and clean-faced sandstone interiors remain in good condition with strong structural integrity. interior sandstone walls of the Kitchen are in good condition. Mortar has ideal porosity and aesthetic suitability.
Roofing (metal)	Poor to Fair	Phase 3/4 First Floor Extension: The current Phase 3/4 corrugated iron gable roof is aged and has minimal end eaves. And may not be preventing water ingress sufficiently. A drier environment within the cottage would favour longer term conservation of the spalling brickwork. All Phase 4 elements, including the current roof detract from the structure.
Windows and doors	Fair to Good	Brick and Sandstone Building: The casement windows are intact but with signs of deteriorating/separating frames. Various windows and doors deriving from Phases 2a to Phase 3 are in variable condition.

3.6 SANDSTONE STABLE

3.6.1 EXTERIOR FORM AND FABRIC

The Stable, anecdotally referred to as a Chapel within the locality and previous reports,⁷⁹ without firm basis, is a sandstone structure with a steeply-pitched gable roof constructed from corrugated iron supported by timber framing. The exterior walls are double-skinned with rubble infill. The external facing blocks feature rock faced ashlar in a similar style to the west elevation of the Kitchen building. It has dressed quoins at each corner (**Plate 57**).

The east and west walls contain a single, slightly off centre porthole window in the centre of each gable glazed with etched glass (**Plate 59**, **Plate 63** and **Plate 64**). A dressed border surrounds the porthole windows. The building also features a total of four six pane casement windows. In the southern façade there are four small porthole apertures providing light and ventilation that are bored through the masonry. The masonry has recently been repointed during extensive specialist restoration and repairs in 2021 that have completely restored a failing, derelict building to near-original condition and integrity.

Original and reconstructed fabric elements are shown in **Figure 18** at the end of **Section 3.6**.

A dormer hay door is located at the centre of the northern roof and is likely to have once supported a pulley and hoist system providing access to the substantial timber floored hay loft roof space (**Plate 62**).

The northern façade at ground level contains two openings- a single door and a double, outward opening set of doors. Both feature heavy traditional hardwood doors braced with strap iron cleats on riveted strap, pintle hinges (**Plate 60**). The building features dressed openings for windows and doors

3.6.2 INTERIOR FORM AND FABRIC

The rectangular enclosed space of the building is divided at ground floor into three spaces, each of different sizes. The larger spaces: the western-most space (Room 3), and the central space (Room 1) (**Plate 61**), are similarly sized, and have stone sett floors and stone walls which have previously been limewashed. A timber ladder provides access to the roof space from room 1. The small room on the eastern side of the building (Room 2) is fully lined with dark stained timber boards and fittings. The timber floor lining appears to sit on top of a stone floor below and there is a second ladder providing access to the roof space. Rows of timber hooks and shelves on the walls suggest that the space was use as a tack room.

Two six pane casement windows provided light to the central room (Room 1) and a further two to the Room 3 (**Figure 18**). Each opening has a splayed reveal detail on the inner face of the sandstone that has previously been assessed as not original to the building.⁸⁰ The masonry had been repointed with period appropriate but distinct lime-based mortar, flush with the stone surface. Floor setts have been pointed with a more rigid composite that though not original, is appropriate to illustrate restoration works and prevent edge wear of the stone setts.

⁷⁹ Niche 2019.

⁸⁰ GB&A 2012.



Plate 58. View toward the Stable from the direction of the cottage. Note the mature Phase 2a Moreton Bay fig tree at right and a dead mature Kurrajong among its limbs (Source: Archive Heritage)



Plate 59. View west toward the Stable showing restored upper masonry and casement and porthole windows (Source: Archive Heritage)



Plate 60. View south toward main northern elevation (Source: Archive Heritage)



Plate 61. Interior of Room 1 showing restored stone walls and floor setts. Entry to the tack room (Room 2) is seen (Source: Archive Heritage)



Plate 62. Restored roof over conserved loft floor joists as seen from Room 1 (Source Archive Heritage)



Plate 63. Western elevation as seen prior to restoration works in 2021 (Source: Niche 2019: p.14)



Plate 64. Current view of restored and conserved masonry and porthole (Source: Archive Heritage)

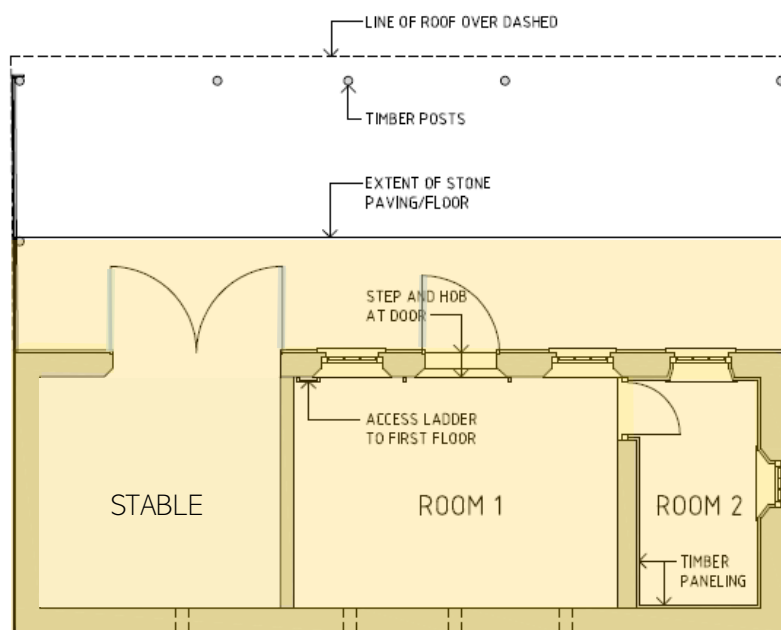
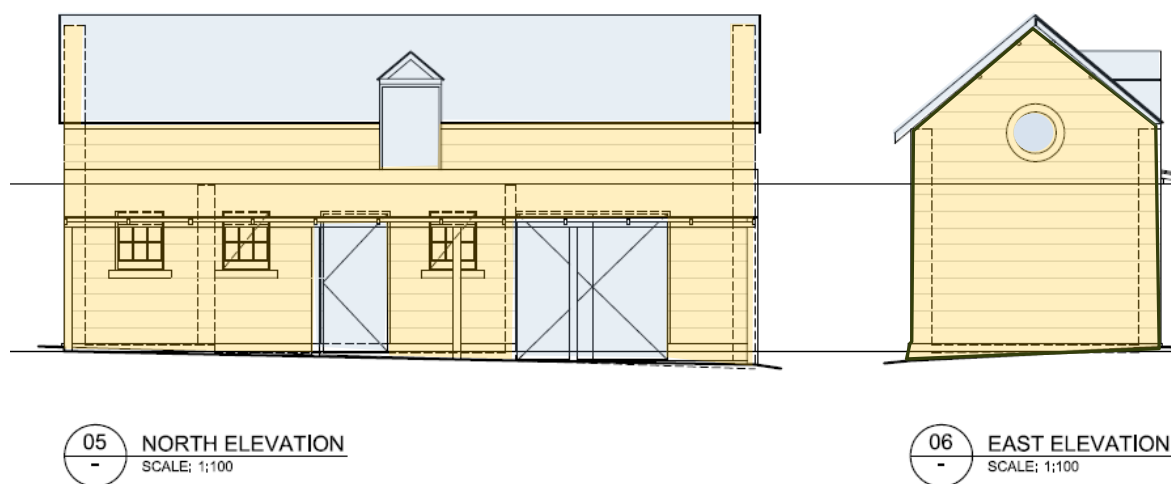


Figure 18. Elevations and ground floor plan of the Stable building. Orange indicates Phase 2b and blue indicates modern reconstruction. The Phase 4 lean to roof has been removed (Source: GBB Architects for ICHPL 2012 with Archive mark-up).

3.6.3 CONDITION AND INTEGRITY

As stated above the Stable building underwent extensive restoration funded by South32 (~\$350,000). These works were undertaken between February and August 2021 and included:

- Reconstruction of the entire roof and reroofing with corrugated iron
- Reconstruction of the entry doors (by Appin Men's Shed)
- Removal and reconstruction of the upper gable end masonry, including repair and reglazing of dressed portholes
- Underpinning of foundations
- Repointing of masonry
- Refencing the level yard around the Stable

As a result, a comparison between the prior (**Table 7**) and present (**Table 8**) condition of the building can be made below.

Table 7. Condition and integrity of the Stable building prior to restoration works in 2021 (reproduced after Niche 2020)

Fabric/Element	Condition	Observations
Sandstone Masonry (Exterior)	Poor	Extensive failure of gable end masonry, Severe longitudinal crack in western gable end, extensive cracking in interior rooms, loss of mortar and bond between upper courses of masonry. Stone paving in good condition. ⁸¹
Sandstone masonry (Interior)	Poor to Fair	extensive cracking in interior rooms, stone setts in good condition.
Roofing (metal)	Poor	The current roof is dilapidated and partially removed. The roof does not prevent ingress of water.
Interior Roof Cavity Members	Poor	The entire roof was decayed and unstable and required replacement.
Windows and doors	Poor	Original doors were missing. Iron hinge pindles set into masonry had rusted and dislodged associated masonry. Glazing cracked and missing, six pane windows were boarded over.

Table 8. Condition and integrity of the Stable building following restoration works in 2021.

⁸¹ John McDonald Building Services, 2019, Dilapidation Report for Mountbatten Chapel, Report prepared for Illawarra Coal Pty Ltd; Niche 2019; GB&A 2012.

Fabric/Element	Condition	Observations
Sandstone Masonry (Exterior)	Good	All compromised masonry had been removed and reconstructed over underpinned foundations to prevent future movement. All gaps in joins and bedding courses repointed with a period appropriate porous quicklime mortar.
Sandstone masonry (Interior)	Good	Cracking reconstructed or mortar patched following underpinning. All gaps in joins and bedding courses repointed with a period appropriate porous quicklime mortar. Walls cleaned but residual whitewash left untouched and in place as part of the fabric history informing significance.
Roofing (metal)	Good	New watertight and period appropriate corrugated iron roof attached.
Interior Roof Members	Good	The entire roof replaced using replica member structure.
Windows and doors	Good	Missing doors replaced with handmade, period appropriate replicas, including hay loft door. Windows repaired and reglazed where necessary.
Fencing	Good	Period appropriate post and rail fencing installed using weathered hardwood rounds and split rounds to define Stable yard.

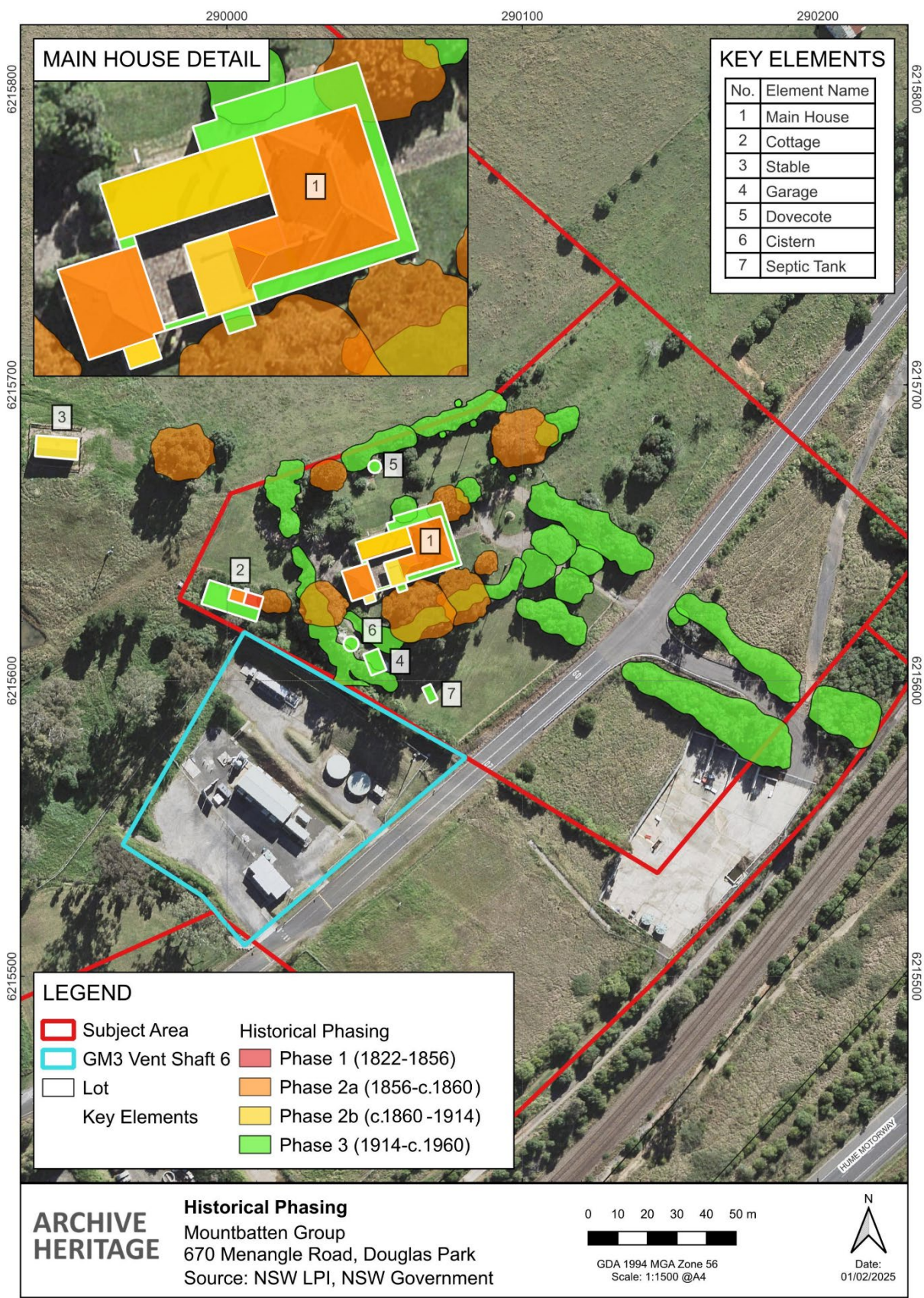


Figure 19. Historical phasing outline for key elements of the Mountbatten Group. (Source: Archive Heritage)

3.7 HERITAGE CURTILAGE

The subject area is the locally significant heritage item 'Mountbatten Group – house, chapel and garden building' and its identified curtilage. It is currently listed as a local heritage item within Schedule 5 of the Wollondilly Shire Council Local Environmental Plan 2011 (LEP #175). The current heritage listing title requires updating and is incompatible with these elements, referring only to the house, 'Chapel' (Stable) and a small, 20th century brick Dovecote within the grounds. The heritage curtilage is illustrated below in **Figure 20**.

In defining the area which is essential for retaining and interpreting the heritage significance of the Mountbatten Group, the following considerations have been revisited and assessed.

- the historical lot
- defining a curtilage that can be maintained under a single ownership
- the changes in land use, existing roads and natural features surrounding the site
- the interpretation of the immediate setting of the house with a circular drive and garden
- the interpretation of the broader open (rural) setting
- the key views to and from the site
- the functional links between the buildings

A brief survey of areas outside the curtilage but within the former Morton Park (Mountbatten) homestead area identified several built heritage features of potential local significance. These were located in two locations:

- 100 m northeast of the northern curtilage boundary and comprising the remains of what appears to be a tenant farm or peripheral element of Morton Park. A subsurface brick cistern was identified that would suggest activity in this area began prior to Phase 3 of the historical timeline.
- The same may apply to areas of the former McMullen horse stud 100 m to the northwest of the Mountbatten Group curtilage. It is noted however that these areas have not been brought into a broader curtilage during successive prior assessments of the heritage item and assessment for this CMP has also determined that the current curtilage is sufficient.

Nonetheless, this physical evidence outside the current curtilage would require further assessment should any potential impact be proposed for these areas.

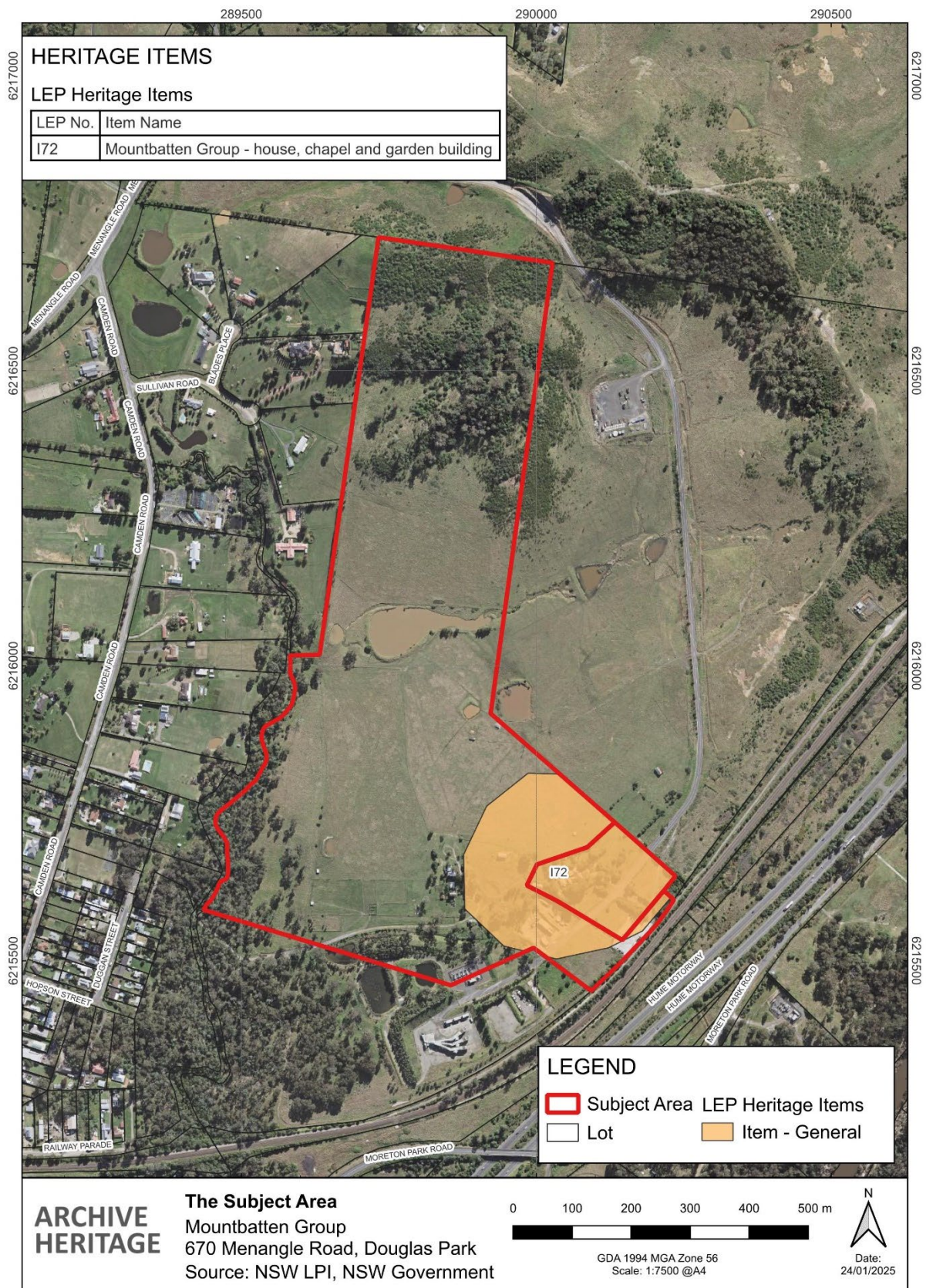


Figure 20. The heritage curtilage for the Mountbatten Group (Source: Archive Heritage)

3.8 HISTORICAL ARCHAEOLOGY

To date, no historical archaeological assessments have been carried out for the Mountbatten Group. The range of present and former buildings and landscape features including remnant agricultural buildings, cisterns, footings, landscape archaeology and historical records all indicate a substantial archaeological resource is present that may reflect occupation of the site since c.1822.

Archaeological assessment is beyond the scope and purpose of this document, however archaeological relics are protected (and defined) under the relics provision of the *NSW Heritage Act* (1977). Any future proposed ground disturbance works west of the Vent Shaft 6 access road and within close proximity (50 m) of historical structures within the Mountbatten Group should be preceded by an Historical Archaeological Assessment (HAA) in order to establish potential impacts that may occur as a result of any such works.

4 SIGNIFICANCE ASSESSMENT

4.1 ASSESSMENT METHODOLOGY

4.1.1 HERITAGE SIGNIFICANCE CRITERIA

Assessment of significance of cultural heritage; the tangible and intangible historical values that are present within the built environment and cultural landscape, is informed by information gathered during the research phase of the project and undertaken against the NSW heritage assessment framework.

The assessment of heritage significance in NSW is underpinned by the Burra Charter (Australia ICOMOS 2013) and further expanded upon in Assessing Heritage Significance: A NSW Heritage Manual Update, 2023 – prepared by the then NSW Office of Environment and Heritage. The Heritage Manual lists seven criteria to identify and assess heritage values that apply when considering if an item is of local, or State significance or significant on a national level.

The criteria against which heritage significance is assessed are outlined below in **Table 9**. A place/item will be considered to be of State or local heritage significance, if it meets one or more of the standard NSW heritage assessment criteria at that level.

Table 9. NSW Guidelines for Assessing Heritage Significance

Criterion	Definition
a) Historical	An item is important in the course or pattern of NSW's (or the local area's) cultural or natural history (Historical Significance).
b) Associative	An item has strong or special association with the life or works of a person, or group of persons of importance in NSW's (or the local area's) cultural or natural history (Associative Significance).
c) Aesthetic	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area) (Aesthetic Significance).
d) Social	An item has a strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural, or spiritual reasons (Social Significance).
e) Research	An item has the potential to yield information that will contribute to an understanding of NSW's (or the local area's) cultural or natural history (Research Significance).
f) Representative	An item is important in demonstrating the principal characteristics of a class of NSW's (or the local area's) cultural or natural places or environments (Representativeness).
g) Rare	An item possesses uncommon, rare, or endangered aspects of NSW's (or the local area's) cultural or natural history (Rarity).

4.1.2 COMPARATIVE ANALYSIS

The Heritage Council of NSW include comparative analysis of heritage items as a means of informing significance assessment through an evaluation of relative significance against NSW historic themes (Marsden and Spearitt 2021) and the NSW assessment criteria (Heritage NSW 2001).

4.1.3 GRADING OF INDIVIDUAL ELEMENTS

Gradings of significance are applied on a site (built or archaeological) that is complex or comprised of separate components or elements that might have variable contributory significance within the overall listing.

Heritage NSW gradings of significance are reproduced in Assessing Heritage Significance: A NSW Heritage Manual Update, 2023. Unless they are visible in the ground, the assessment of relics is hypothetical as their existence as intact and substantial sites is a prediction based on background research and site conditions.

Table 10. NSW guideline for assessing Gradings of Significance.

Grading	Definition	Status
Exceptional	Rare or outstanding element directly contributing to an item's local or state significance.	Fulfils criteria for local or State listing.
High	High degree of original fabric. Demonstrates a key element of the item's significance. Alterations to not detract from significance.	Fulfils criteria for local or State listing.
Moderate	Altered or modified elements. Elements with little heritage value, but which contribute to the overall significance of the item.	Fulfils criteria for local or State listing.
Little	Alterations detract from significance.	Does not fulfil criteria for local or State listing.
Intrusive	Difficult to interpret.	Does not fulfil criteria for local or State listing.

4.2 COMPARATIVE ANALYSIS

This section provides comparative context for the heritage item to provide a basis for understanding significance.

4.2.1 HERITAGE ITEMS SELECTED FOR COMPARATIVE ANALYSIS

The former Cowpastures region of the 19th century was extensively settled and developed as a series of landed estates and smaller farms, including the subject area. Over time land became subdivided and developed as commercial farms and livestock properties. These histories are well represented in the built fabric and character of the contemporary heritage landscape, as they are across rural NSW as a whole. As a result, a large number of heritage items exist within the region that hold significance at varying levels and are comparable to Mountbatten Group. Three relevant listings are presented below in **Table 11**.

Table 11. Comparative Analysis of other homestead heritage items within the region with the Mountbatten Group.⁸²

Heritage item	SHR/LEP Listing	Description	Significance	Statement of Significance	Comparative Analysis	Image
Harrington Park	SHR #01773	<i>Harrington Park Homestead Complex is the core of a once much larger historic farm estate, covering what today is the new suburb of Harrington Park. The centre of the historic estate includes the area around the homestead, outbuildings, garden, yards, former nursery site(s) etc.</i> <i>The Harrington Park Homestead comprises a single storey rendered brick vernacular section (1817) and a later single pile Georgian (with later Georgian, Victorian and Modern overlays) rendered brick section 'spread over three vast floors', which faces south (the earliest part was built between 1817-29 and then faced north. A triangular pedimented piece above the central steps and columns. The front has an extensive stone-flagged verandah and a deep wooden fascia under the verandah eaves. Beneath the house is an extensive cellar and a remarkable bowed drawing room at the rear (north), which leads out into the garden. A kitchen block lies to the west of the main homestead block.</i> <i>Further buildings and structures on the site include the following:</i> <i>The Studio (Billiard Room); Farm Cottages 1 & 2, including swimming pool; Farm Storage Sheds 1, 2 & 3; Shelter to Pump Station;</i>	(Criterion a) – Historical (State) (Criterion b) – Associative (State) (Criterion c) – Aesthetic (State) (Criterion d) – Social (Local) Criterion e) – Research Significance (State) (Criterion f) – Representative (State) (Criterion g) – Rare (State)	<i>Harrington Park is of State significance as one of the earliest 'Cow Pasture' homesteads on the Cumberland Plain</i> <i>Harrington Park forms part of a grant to the mariner and trader, William Douglas Campbell, by Governor Macquarie in 1815. The homestead built in stages between 1817 and 1827, associated structures, gardens, landscape features, and remnant grazing paddocks have historical, social, aesthetic and technical significance at the State level.</i> <i>Harrington Park demonstrates the layout of a gentleman's estate with views and vistas afforded to and from the homestead over the landscape and important access routes. The remnant cultural landscape has many features of individual significance such as the original cottage, early homestead, garden, entry drive from the old Cowpastures Road (Camden Valley Way), the 1957 garden studio and the remaining estate area.</i> <i>Historically the quintessential landscape character - based on the traditional juxtaposition of homestead area, with</i>	Harrington Park has contemporaneous origins in the early years of the Cowpastures settlements after 1815. Unlike Mountbatten, it has retained substantial built heritage from the earliest phase of settlement and has since been expanded and enhanced over successive generations of prominent, wealthy landowners. The estate is significant under all Criteria, most of which are at the State level.	

⁸² Heritage NSW State Heritage Inventory sheets www.hms.heritage.nsw.gov.au

Heritage item	SHR/LEP Listing	Description	Significance	Statement of Significance	Comparative Analysis	Image
		<i>Carriage Loop; Arboretum (collection of trees); and</i> <i>Part of 1890s arrival drive.</i> <i>In the 1890s major house renovations occurred</i> <i>The large circular / elliptical carriage loop south of the homestead is lined with mature trees, predominantly large conifers- these distinguish the homestead group and due to their height and colour, mark its site and can be seen from quite some distance away. These include Bunya Bunya and hoop pines, Canary Island pines (Pinus canariensis). Non-coniferous species include the native kurrajongs (Brachychiton populneus), Norfolk Island hibiscus / white oak / cow itch tree (Lagunaria patersonia - several), European olive (Olea europaea cv. - several - at least some are 19th century) and silky oak (Grevillea robusta), dating from the mid-late 19th century. Some shrubs may date from the 19th century also, such as pomegranate. Later plantings of trees and shrubs date from the early and mid-twentieth century.</i> <i>The item is associated with:</i> <i>- c.1820-50 - Campbell family;</i> <i>- c.1855-c1875 - Davy family;</i> <i>- 1875-90 - Rudd family;</i> <i>- 1890-1930 - Rudd family descendents;</i> <i>- 1930-44 - Swan family;</i> <i>- 1944-2013 - Fairfax family;</i> <i>The homestead is situated in a fine location fairly high on a south-sloping hill commanding a direct view from the homestead south-sou-west to the Razorback Range.</i>		<i>its dominant garden, and cleared pastureland beyond - represented one of the best examples of this intentional contrast as well as the siting of a homestead group on a landform summit in the Cumberland Plain / Camden area.</i> <i>The place currently retains some key historical visual relationships - vistas to Orielton, Studley Park, the spire of St. John's Church, Camden and the Razorback Range. Its historical relationship to other nearby early grants (Orielton & Oran Park) and its place in the development of the local area can still be appreciated. The place currently retains its historical local prominence and serves as an important local landmark.</i> <i>The property has strong associations with members of the ruling class in early NSW and the familial dynasties of the Campbells (1810s - 1850s); the Rudds-Brittens (1870s - 1920s) and the Fairfax publishing family 1940s - 2005).</i> <i>The place has considerable capacity to demonstrate its development from the early 1810s to the present. It is of considerable scientific interest on account of its archaeological research potential.</i>		

Heritage item	SHR/LEP Listing	Description	Significance	Statement of Significance	Comparative Analysis	Image
		<i>The homestead is situated in a fine location fairly high on a south-sloping hill commanding a direct view from the homestead south-south-west to the Razorback Range.</i>				
Beulah	Not listed on SHR; SHI # I00368	Beulah is part of an estate known as Summer Hill that was formed from four adjacent portions within the Parish of Menangle that were granted in 1823. Portion 78 was granted to a Cornelius O'Brien and there is evidence that O'Brien/Ryan was farming on his land in 1822. Sometime between 1831 and 1839 Duncan Cameron owned the site and the main buildings were erected by that date. It was leased to Lachlan McAlister in that year for 800 pounds, indicating substantial improvements. The property is broadly rectangular running away from Appin Road on its eastern side towards the Upper Canal water supply for Sydney to its west. A driveway winds from Appin Road over Woodhouse Creek through an area of forest (Humewood Forest), past a former dam and bore and an area of remnant formal planting layout to the homestead group with remnant plants, outbuildings and fence lines. House: A single storey, 3 bay symmetrical homestead of coursed random stone construction, stuccoed to front. Double steeply pitched roof clad with corrugated steel in short sheets, with timber shingling beneath. There are two tall masonry chimneys. There is a stone flagged verandah to front returning on sides to two	(Criterion a) – Historical (State) (Criterion b) – Associative (Local) (Criterion c) – Aesthetic (Local) Criterion e) – Research Significance (Local) (Criterion f) – Representative (Local) (Criterion g) – Rare (State)	<i>Beulah is of State historical significance as an entire cultural landscape containing early Colonial structures - homestead group and stone bridge - remnant 19th century farm and garden layout, an octagonal pavilion or summer house as a major focal element and a remnant spotted gum (Corymbia maculata) forest as a result of early conservation planning (Morris & Britton, 2000, 72).</i> <i>The land was part of land grants promised in 1821 which appear to have been occupied by a building by 1822 (documentary record of Governor Macquarie visit to the district), though the current buildings date from 1835-1839. The property includes an 1830s timber bridge across Woodhouse Creek (linking to the associated item Humewood Forest).</i> <i>The property has historical association with the family of Francis Rawdon Hume (brother of Hamilton Hume and co-explorer) and his descendants - particularly his son John Kennedy Hume and his family, and his daughter Ellen Clayton Hume (d. 1936). Francis Rawdon Hume was the original land</i>	Beulah is considered of State significance for its historical importance in demonstrating early land acquisition, settlement and use in the Cowpastures and for the rarity of its built fabric and landscape, deriving from the equivalent of the historical Phase 1 in this assessment (1822-c.1856). By the early 2000s the house, bridge and outbuildings had deteriorated to a ruinous state. Subsequent restoration has conserved the site and buildings, highlighting the importance of the active management of heritage assets. While the built fabric and landscape of the Mountbatten Group provides some physical evidence of this important early time, the historical context of Mountbatten can be interpreted largely as that of the latter 19th century.	

Heritage item	SHR/LEP Listing	Description	Significance	Statement of Significance	Comparative Analysis	Image
		small corner verandah rooms. Rear flat roofed addition has a slit window. Attached dairy and the picket fence has been destroyed in recent years. Interior: Central corridor, 2 principal rooms with fireplaces, reeded or fluted chimney pieces (described in Sept, 1977), back hall, two back rooms. 19th c. Outbuildings: To the north of the homestead group is a dairy with stone slab floor. To its south-west is an octagonal summer house ruin. This was deliberately sited in an area giving both the best views and summer breezes. It has a clear relationship to the homestead group and to adjoining Meadowvale homestead group to its south-west - on axis. Garden: Remains of (later) extensive picket fence and carriage loop. (National Trust (NSW)). A dump of an old rose, possibly Scotch rose (<i>Rosa spinosissima</i>) is to the rear of the house. A kurrajong (<i>Brachychiton populneum</i>), date palm (<i>Phoenix dactylifera</i>) and peppercorn tree (<i>Schinus molle</i> var. <i>areira</i>) are to the front/east of the house. A formal garden was/remains on the eastern side of the house and outbuildings to its west or rear. On both sides of the driveway which continues west of the homestead group were cultivated paddocks - visible in a 1947 aerial photograph - patterns indicating possible former orchards or pasture improvement in this area. Dams and another area of cultivation patterns in the farm's south-west.		<i>grantee of Portion 77 of the property, and the entire 200 acre property was in the ownership of the Hume family for 90 years from 1846-1936. The house is of aesthetic significance as a rare and fine example of the Old Colonial Georgian style in its original historic setting. The property has a high level of archaeological research significance for its potential to reveal details of the layout and use of an early Colonial pastoral property.</i>		

Heritage item	SHR/LEP Listing	Description	Significance	Statement of Significance	Comparative Analysis	Image
		Beulah adjoins Meadowvale to its south, another colonial farm estate and this boundary is marked by remaining post and rail fencing (Morris & Britton, 2000, figure 4.19 site plan). The timber beam bridge over Woodhouse Creek on 'Beulah' (adjoining Humewood Forest) is believed to be the only example of its type in private ownership and the only one known to retain a full set of stringer girders intact. It is a rare remnant of Australia's oldest surviving form of bridge construction. and is believed to be contemporary with the house (1830-1840).				
Farm buildings and site of previous Pictona Stud	LEP #11 14	Located midway down a hill beside the old Mowbray Park to Picton Road, now Rays Lane. The entrance driveway has a fine pair of Bunyah tress which probably marked the original entrance. Current access bypasses the residential areas to continue into the dairying area on the top of the hill. On top of the hill also stood an ice factory, closed in 1963 and now demolished. single-storey stone over 1850's slab and two-storey brick extension.(1905). Modern bungalow at rear. Land granted in 1823 but apparently not farmed until the 1850's when the Ray family acquired it. The first house was slab (1850's) now partly covered by the present single-storey stone. Two-storey extension built by George Hilder Ray, grandfather of the present Mr Ray. It is now a Guernsey Stud and dairy farm.	(Criterion a) – Historical (Local) (Criterion b) – Associative (Local) (Criterion c) – Aesthetic (Local) (Criterion d) – Social (Local) Criterion e) – Research Significance (Local)	<i>Pictona is a well-preserved farming complex of the 1850's and 1900's with an unbroken history of farming by one family since the 1850's. The dairy was an early producer and continues to be in use. Until 1963 it also manufactured ice. The stud is the oldest Guernsey stud in the area (since 1906). The site has additional significance for its collection of fine Victorian farm buildings The main homestead incorporates a slab hut and a well-constructed sandstone farmhouse, both of which are noteworthy in the region.</i>	Pictona is comparable to the Mountbatten Group in terms of its historical accessibility, built fabric integrity and representativeness within the region, where rural homesteads were once ubiquitous and remain well represented, though in varying states of integrity and tenure.	

Heritage item	SHR/LEP Listing	Description	Significance	Statement of Significance	Comparative Analysis	Image
		An excellent representative example of 19th century farming complexes that is substantially intact.	(Criterion f) – Representative (Local) (Criterion g) – Rare (Local)			

4.3 ASSESSMENT OF OVERALL SIGNIFICANCE

The assessment of significance below draws directly from previously prepared CMPs⁸³ where relevant, with additional information/assessment added as required.

Criterion a

- An item is important in the course, or pattern, of NSW's cultural or natural history (State significance); or
- An item is important in the course, or pattern, of the local area's cultural or natural history (local significance) (local significance).

The Mountbatten Group at Moreton Park is of historical significance as an early homestead site. The existing form of the homestead dates from the late 1850s, with successive phases of change evident in the fabric of the buildings, which evoke a 19th century way of life. Moreton Park was originally established by Jean Baptiste Lehimas De Arrieta in 1822 in the previously undeveloped cow pastures area near Camden. Upon arriving in the Colony in 1821, De Arrieta took up his 2,000-acre grant, and along with his assigned labour, began clearing land to grow tobacco. De Arrieta sold the property in 1828, remaining there until his death in 1835.

The principal phase of development was between 1858 and 1914. During this period the property was owned and occupied by Ellen Rosetta Hughes (later McMullen) and the Main House complex was constructed. It was during this time that the present form of the building group was substantially developed. It is likely that the stone Stable building dates from this period. The Main House was the hub of the immediate farming community, with the stone Kitchen providing for family and guests and possibly a number of the tenant farmers who also worked on the property. After 1914 the property was gradually subdivided and the Main House successively converted and adapted for various uses, including weekend residence, guest and boarding houses and later a riding school. These changes of use also effectively broke the continuity of the site as a farming property.

Following the purchase of the property by BHP, the integrity of the Mountbatten Group was diminished through the construction of a new road that severed the carriage drive and the removal of important boundary plantings. Owing to these changes, and its unexceptional and changing uses over time, the property is considered to have local significance under this criterion.

Criterion b

- An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW'S cultural or natural history (State significance); or
- An item has strong or special association with the life or works of a person, or group of persons, of importance in the cultural or natural history of the local area (local significance).

The site is associated with Jean Baptiste Lehimas De Arrieta, the original grantee for Moreton Park. De Arrieta, a Spaniard, arrived in Australia in 1821. He was middle aged when he arrived in the colony and letters of introduction suggest he had lost both land and a fortune in his home country. The grant is believed to have been issued to De Arrieta as some form of compensation for losses occasioned in his services to the British government in Spain. Very quickly De Arrieta found himself in financial difficulties, crops were failing and a record of substantial loans as early as mid-1823 indicate a possible lack of

⁸³ GB&A 2012; Niche 2020

financial acumen. The stone Stable building is anecdotally closely associated with De Arrieta, however, this association has not been confirmed following extensive documentary research, nor by close examination of the fabric of the building carried out for this CMP. However, the early brick cottage, as well as the cistern within the Main House complex, are possible physical links to historical Phase 1 under De Arrieta. While Jean De Arrieta is well known as a historical identity within the local context, he is not important at a regional level, as is the case with many prominent landowners and families such as the Macarthur's and the Marsden's.

Ellen Rosetta Hughes (McMullen) began a sixty-year association with the site in 1874 when the property was deeded to her by her paternal grandmother, Rosetta Terry. It was during Ellen Rosetta's occupation that the Main House was constructed, and the current arrangement of the buildings was established. Following the death of her husband, Samuel Terry Hughes, in 1868, Ellen Rosetta ran Moreton Park on her own. The Grevilles Official Post Directory of New South Wales 1872 shows that tenant farming continued on the property with a series of newspaper articles painting a picture of life at Moreton Park during this period with Ellen Rosetta playing an important role in the local community.

Subsequent owners of the Mountbatten Group are not known as key or important personalities beyond their immediate community.

Through its association with De Arrieta and the Hughes McMullen family, the Mountbatten Group has significance at the local level under this criterion.

Criterion c

• An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or

technical achievement in NSW (State significance); or

• An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area (local significance).

The Mountbatten Group is of local significance as a restored example of a mid-Victorian homestead complex in an open rural context. The hilltop site provides a visual setting which supports an understanding of the scale and character of the group during its mid-Victorian phase of development.

A high degree of the external structure of the Main House is original, however, the internal layout and finishes have been substantially altered, primarily due to work to provide additional accommodation for the post-1914 guest and boarding house uses, then through the restoration of the place to return it to its mid-Victorian form in the 1980s. This work has diminished the aesthetic significance of the site as an intact example of this architectural style, however it does provide an opportunity to interpret a mid-Victorian homestead complex.

The Mountbatten Group is complemented aesthetically by its landscape features, including its layout, driveway and mature trees, typical of 19th century homestead gardens. Views of the buildings on a hilltop site also contribute to a further understanding of the original rural setting.

The Mountbatten Group retains its architectural and landscape qualities overall and is considered to have local significance under this criterion.

Criterion d

• An item has a strong or special association with a particular community or cultural group in NSW for social, cultural or spiritual reasons (State significance); or

- An item has a strong or special association with a particular community or cultural group in the area for social, cultural or spiritual reasons (local significance).

The Mountbatten Group at Moreton Park does not demonstrate any level of social significance with any particular community or cultural group in New South Wales. The Mountbatten Group is not considered to have significance under this criterion.

Criterion e

- An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (State significance); or
- An item has potential to yield information that will contribute to an understanding of the area's cultural or natural history (local significance).

The Mountbatten Group is of research significance for its potential ability to yield archaeological information. The early date of the property and its convict associations suggest a high likelihood that there archaeological relics may occur within and beyond the current listed curtilage.

As yet no archaeological assessment has been conducted and no archaeological deposits have been documented. However, the retained open landscape and documented history for the occupation of current and previous buildings suggest archaeological resources may exist.

The Mountbatten Group has local significance under this criterion.

Criterion f

- An item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (State significance); or
- An item possesses uncommon, rare or endangered aspects of the area's cultural or natural history (State significance).

The Mountbatten Group is not rare as a nineteenth century homestead complex, as there are numerous properties which both present with higher integrity and have had a continuous pattern of use. The Mountbatten Group's historical use ceased with the subdivision of the property in c.1916, with the homestead adapted for various uses since that date. The repeated changes necessary to accommodate these changing uses resulted in widespread erosion to the nineteenth century fabric, including a major restoration of the Main House in the late 1980s to return it to its mid-Victorian character.

The site is not considered to have significance under this criterion.

Criterion g

- An item is important in demonstrating the principal characteristics of a class of NSW's
 - Cultural or natural places; or
 - Cultural or natural environments (State significance); or
- An item is important in demonstrating the principal characteristics of a class of the area's
 - Cultural or natural places; or
 - Cultural or natural environments (local significance).

The Mountbatten Group is significant as a representative example of a mid-Victorian homestead development. Changes to the use of the site over time, and changes to the fabric resulting from this,

have both added historical interest and diminished the original integrity of the site and built fabric, Overall, the property is considered to have local significance under this criterion at the local level.

4.4 ASSESSMENT OF CONTRIBUTORY SIGNIFICANCE OF BUILT ELEMENTS

Taking into account the condition and integrity of the built fabric and landscape that make up the heritage item, standard gradings (**Table 10**) are applied below to the various contributory elements to inform significance and future management of the asset (**Table 12**). An overview of significance gradings of elements of the Mountbatten Group is provided in **Figure 21-Figure 24**.

Table 12. Grading of significance for landscape and built fabric elements within the subject area.

Area of Mountbatten Group	Identified Built/landscape Elements	Grading of Significance for Contributory Element	Status of Element
Garden and grounds	Plantings identified as likely deriving from Phase 2a	High contributory significance	Fulfils Criteria for local listing
	Plantings identified as likely deriving from Phase 2a	High contributory significance	Fulfils Criteria for local listing
	Coach circle	High contributory significance	Fulfils Criteria for local listing
	Dovecote	High contributory significance	Fulfils Criteria for local listing
	Cistern	High contributory significance	Fulfils Criteria for local listing
	Former tennis court	Moderate contributory significance	Fulfils Criteria for local listing
	Pet memorials	Little contributory significance	Does not fulfil Criteria for local listing
	garage	Little contributory significance	Does not fulfil Criteria for local listing
	Phase 3 septic tank	Little contributory significance	Does not fulfil Criteria for local listing
	Phase 4 concrete slab	Intrusive – detracts from significance	Does not fulfil Criteria for local listing
	Self-sown invasive weeds and shrubs	Intrusive – detracts from significance	Does not fulfil Criteria for local listing
Main House complex – Phase 2a	All original masonry of Main House and North Wing	High contributory significance	Fulfils Criteria for local listing
	Original timber members	High contributory significance	Fulfils Criteria for local listing
	Cylinder glass sash windows	High contributory significance	Fulfils Criteria for local listing

Area of Mountbatten Group	Identified Built/landscape Elements	Grading of Significance for Contributory Element	Status of Element
	Roofing slate	High contributory significance	Fulfil Criteria for local listing
	Cistern/well in Courtyard	High contributory significance	Fulfil Criteria for local listing
	Front and Courtyard doors of Main House and doors of North Wing	High contributory significance	Fulfil Criteria for local listing
	Lath and plaster ceilings (if present & concealed)	High contributory significance	Fulfil Criteria for local listing
Main House complex – Phase 2b	South Wing	High contributory significance	Fulfil Criteria for local listing
	French doors of Main House	High contributory significance	Fulfil Criteria for local listing
	Some internal doors of Main House	Moderate contributory significance	Fulfil Criteria for local listing
Main House complex – Phase 3	French door in South Wing	High contributory significance	Fulfil Criteria for local listing
	Later large pane windows, transoms and sidelights	High contributory significance	Fulfil Criteria for local listing
	Paving in Courtyard	Moderate contributory significance	Fulfil Criteria for local listing
	Masonry arch wall	Moderate contributory significance	Fulfil Criteria for local listing
	Timber mouldings in Main House	Moderate contributory significance	Fulfil Criteria for local listing
	Wood panel ceilings	Moderate contributory significance	Fulfil Criteria for local listing
	Corrugated iron rooves of north and South Wing s	Little contributory significance	Does not fulfil Criteria for local listing
	Verandah	Moderate contributory significance	Fulfil Criteria for local listing

Area of Mountbatten Group	Identified Built/landscape Elements	Grading of Significance for Contributory Element	Status of Element
	Light fittings	Little contributory significance	Does not fulfil Criteria for local listing
	Northern extension of Main House	Little contributory significance	Does not fulfil Criteria for local listing
	Render in rooms with concealed fireplaces,	Intrusive – detracts from significance	Does not fulfil Criteria for local listing
Main House complex – Phase 4	Roof members gutters and roof flashings	Little contributory significance	Does not fulfil Criteria for local listing
	Plasterboard walls, cornices and ceilings	Little contributory significance	Does not fulfil Criteria for local listing
	Timber floors and joists	Little contributory significance	Does not fulfil Criteria for local listing
	Majority of roof members	Little contributory significance	Does not fulfil Criteria for local listing
	Kitchen of Main House	Little contributory significance	Does not fulfil Criteria for local listing
	Bathrooms of Main House and North Wing	Little contributory significance	Does not fulfil Criteria for local listing
Kitchen (Entertainment Room)	Phase 2a masonry including fireplace and chimney	High contributory significance	Fulfil Criteria for local listing
	Phase 2a subfloor likely to be beneath present timber floor	High contributory significance	Fulfil Criteria for local listing
	Phase 2a rendered foundation plaque above fireplace	High contributory significance	Fulfil Criteria for local listing
	Phase 3 fireplace surround	Moderate contributory significance	Fulfil Criteria for local listing
	Phase 3 timber floor	Little contributory significance	Does not fulfil Criteria for local listing
	Phase 3 windows and coffered ceiling	Little contributory significance	Does not fulfil Criteria for local listing

Area of Mountbatten Group	Identified Built/landscape Elements	Grading of Significance for Contributory Element	Status of Element
	Phase 4 composite mortar repointing	Intrusive – detracts from significance	Does not fulfil Criteria for local listing
'Cottage'	Phase 1/2a sandstock brick structure with cellar	High contributory significance	Fulfil Criteria for local listing
	Phase 2a/2b sandstone and render extension	High contributory significance	Fulfil Criteria for local listing
	Phase 2a/2b sandstone paving	Moderate contributory significance	Fulfil Criteria for local listing
	Phase 3/4 western, southern and first floor additions	Intrusive – detracts from significance	Does not fulfil Criteria for local listing
Stable	Phase 2b masonry (restored)	High contributory significance	Fulfil Criteria for local listing
	Phase 2b sett floor and exterior paving	High contributory significance	Fulfil Criteria for local listing
	Phase 2b restored casement windows	Moderate contributory significance	Fulfil Criteria for local listing
	Phase 4 timber tack fittings in Room 2	High contributory significance	Fulfil Criteria for local listing
	Phase 4 reconstructed doors	Moderate contributory significance	Fulfil Criteria for local listing
	Phase 4 restored/replaced roof	Moderate contributory significance	Fulfil Criteria for local listing
	Phase 4 reconstructed post and rail fence	Moderate contributory significance	Fulfil Criteria for local listing

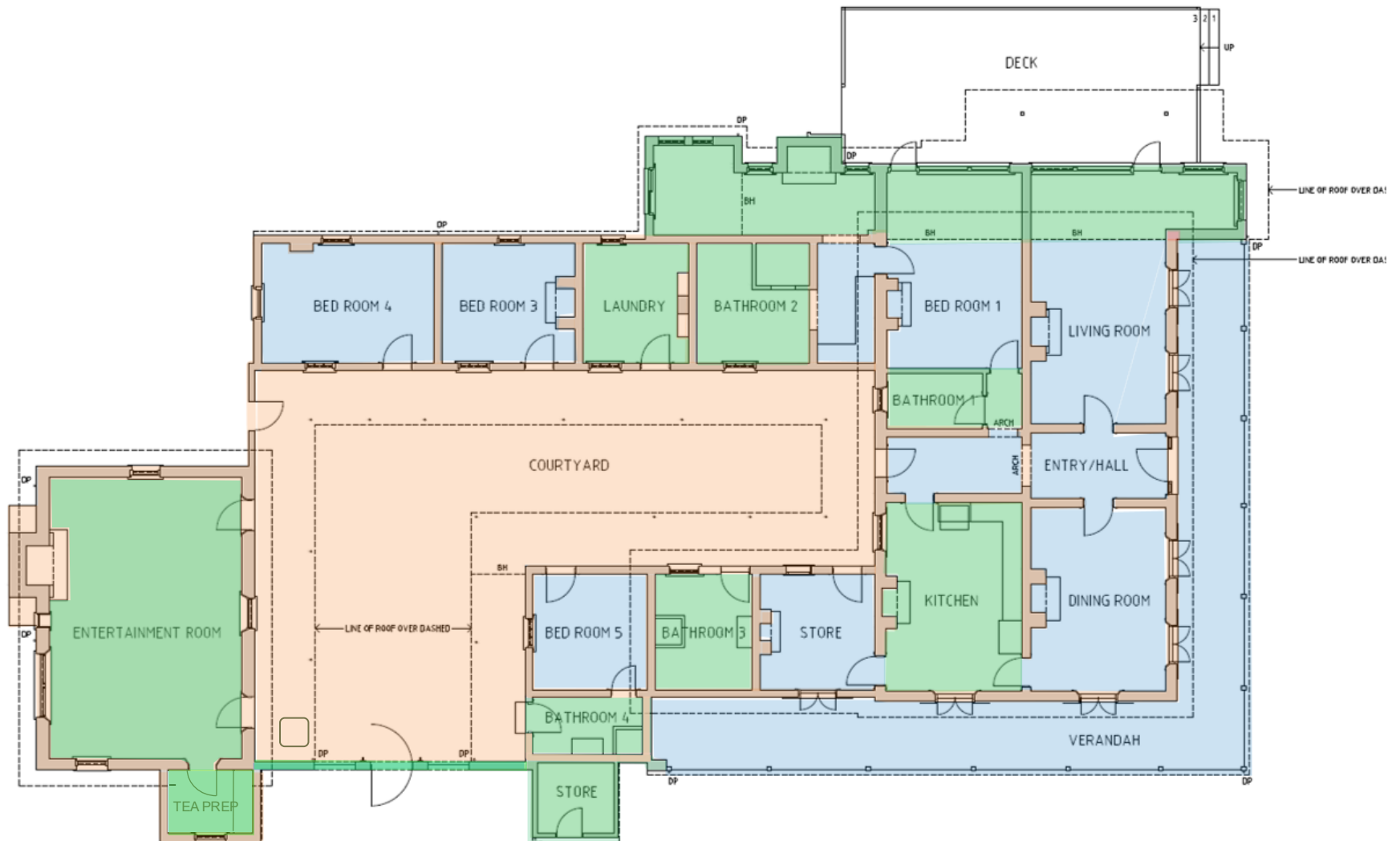


Figure 21. Revised Grading of significance for the internal fabric of the Main House complex. Note: gradings do not take into consideration significance of potential archaeological resources. Orange indicates **High** significance, blue, **Moderate** significance and green **Little** significance based on the condition and historical integrity of fabric. The gradings as shown here refer only to elements shown in floor plan. For all elements refer to Table 10. (Source: GBB Architects for Illawarra Coal Holdings 2012 with Archive mark-up).

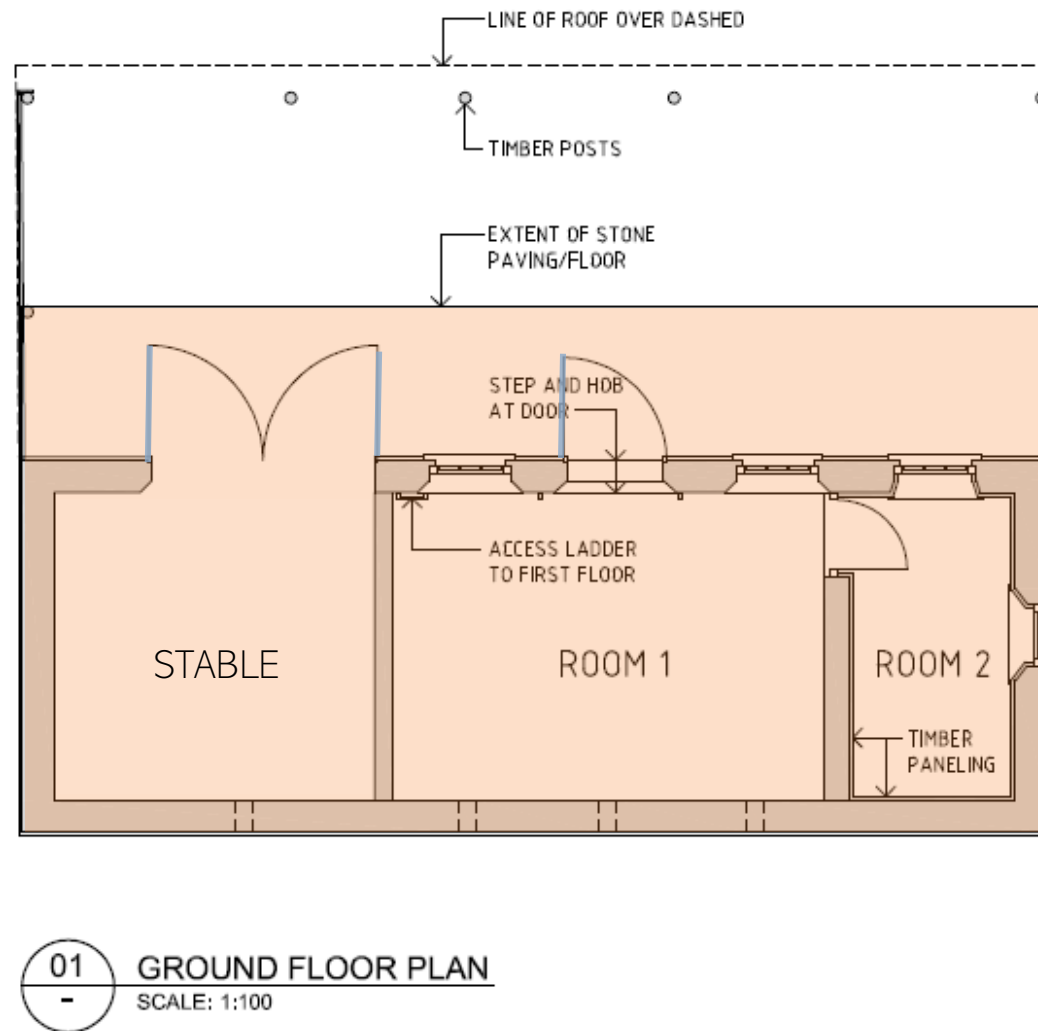


Figure 22. Revised Grading of significance for elements of the Stable building. Note: gradings do not take into consideration significance of potential archaeological resources. Orange indicates High significance, blue, Moderate significance. The gradings as shown here refer only to elements shown in floor plan. For all elements refer to Table 10. Floorplan source: GBB Architects for Illawarra Coal Holdings 2012 with Archive mark-up).

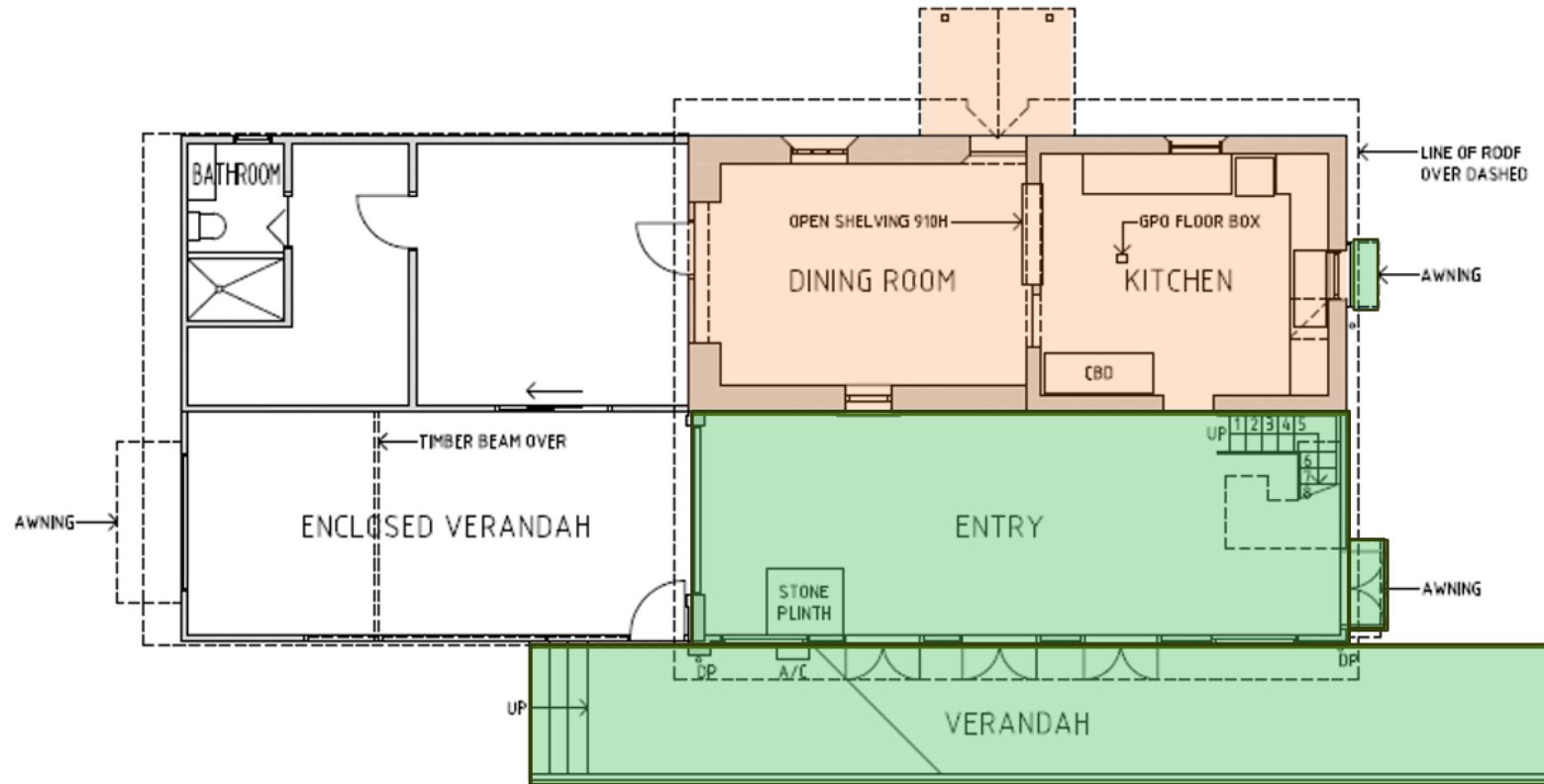


Figure 23. Revised Grading of significance for elements of the Cottage building. Note: gradings do not take into consideration significance of potential archaeological resources. Orange indicates High significance, green, Little significance. White indicates Intrusive elements that have been removed. The gradings as shown here refer only to elements shown in floor plan. For all elements refer to Table 10. Floorplan source: GBB Architects for Illawarra Coal Holdings 2012 with Archive mark-up).

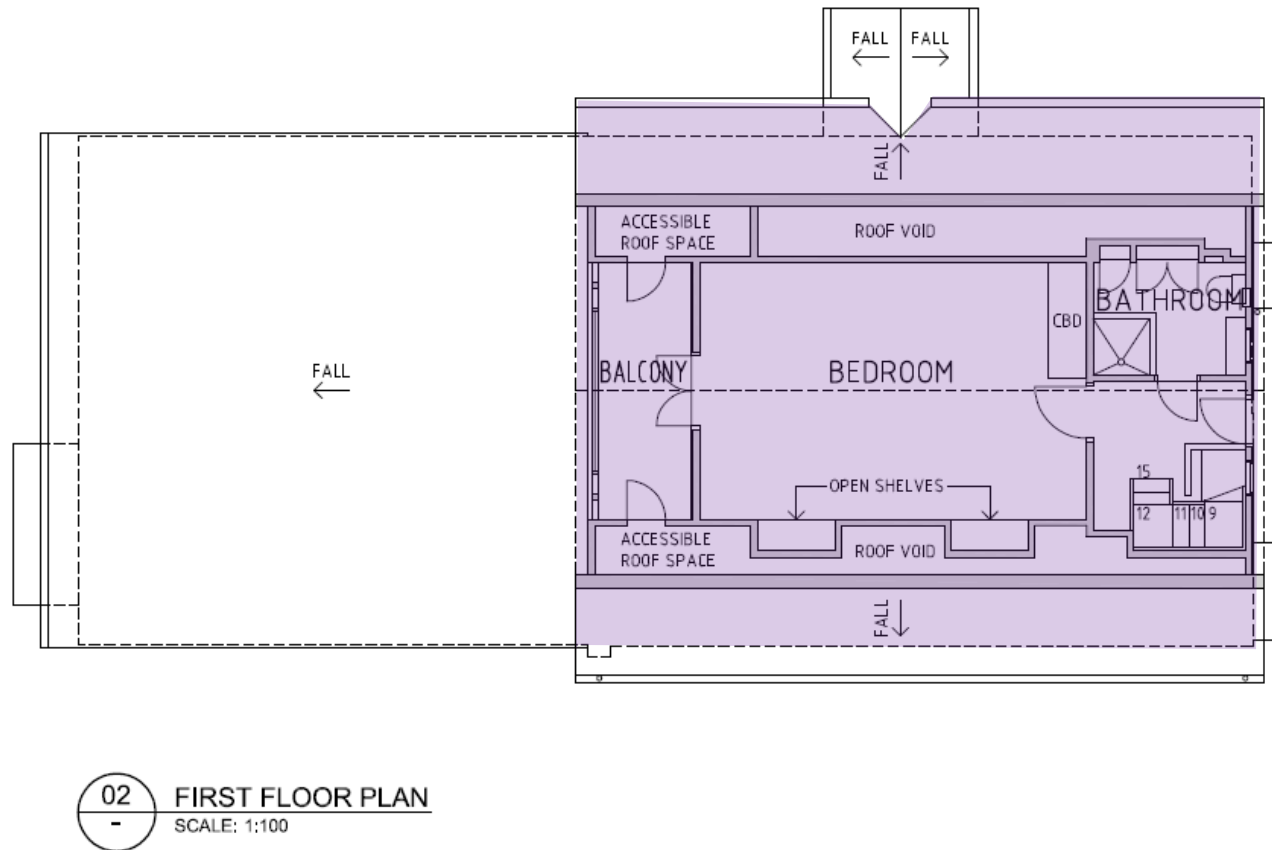


Figure 24. Revised Grading of significance for elements of the first floor of the Cottage building. Purple indicates Intrusive elements that detract from significance. The gradings as shown here refer only to elements shown in floor plan. For all elements refer to Table 10. Floorplan source: GBB Architects for Illawarra Coal Holdings 2012 with Archive mark-up).

4.5 SUMMARY STATEMENT OF SIGNIFICANCE

The Mountbatten Group is of local historical significance as an early homestead site in Douglas Park. The existing mid-Victorian form of the homestead and its setting date from the late 1850s, with successive phases of change evident in the fabric of the buildings. The group is significant for its ability to illustrate early ways of life.

The Mountbatten Group is of local historical significance for its association with Jean Baptiste Lehimas De Arrieta, who originally established the site in 1822, in the previously undeveloped Cowpastures. Upon arriving in the colony in 1821, De Arrieta took up a 2,000-acre grant, and along with his assigned labour, began clearing the land. De Arrieta's ownership of the site ceased in 1828 however, he lived at the property until his death in 1835 and this CMP has identified that built fabric and archaeological resources of De Arrieta's time on the property are likely to remain that contribute to the item's local significance under Criterion e (Research value).

The principal phase of development of the site was between 1858 and 1914. During this period, the property was owned and occupied by Ellen Rosetta Hughes (McMullen) and saw the construction of the Main House. It was during this time that the present form of the buildings was substantially developed. It is likely that the stone Stable dates from this period.

Substantial changes to the site commenced after Ellen Rosetta Hughes' death in 1914, with the property gradually subdivided and the Main House successively converted and adapted for various uses, including a weekend residence, guest and boarding houses, and later a riding school. These changes of use also effectively broke the continuity of the site as a farming property.

The Mountbatten Group has aesthetic significance at the local level as a good example of a mid-Victorian homestead complex in an open rural setting. The hilltop site provides a visual context which supports an understanding of the scale and character of the group during its mid-Victorian phase of development. Landscape components of the site and its setting have been identified as significant, these include the siting, layout, circular drive, and the garden surrounding the house, including the small dovecote, together, in a wider open rural setting. These landscape components are consistent with a number of other early homestead complexes in the region. The cottage retains remnant elements of early brick construction, possibly pre-dating the Main House, however, the level of alteration and addition has diminished its significance. The stone Stable is simple in form with typical characteristics of a farm building, however, a high degree of the original stone fabric has been retained, reconstructed and conserved through efforts that attest to the value of the Mountbatten Group.

The integrity of the setting has been impacted through past works carried out close to the Main House, particularly the proximity of Vent Shaft 6, however the Mountbatten Group as a whole retains good landscape values reflective of the development history and good connection to key views and vistas, notably to Spaniard's Hill and the Razorback Range. The item is considered to be of local heritage significance as a surviving, albeit modified example of a 19th century homestead.

5 CONSTRAINTS AND OPPORTUNITIES

5.1 OVERVIEW

The development of conservation policies for the Mountbatten Group requires consideration of a range of matters pertaining to the management of the physical asset. The majority of these considerations have not varied in any great extent since the first CMP for the Mountbatten Group was commissioned in 2012. As a result, this Section is structured after and largely reproduced from the 2020 CMP summary of the constraints and opportunities present,⁸⁴ Where new constraints or opportunities have arisen since 2020, these matters are introduced and considered by category.

These can be divided into the following main categories:

- constraints and opportunities arising from significance
- constraints and opportunities arising from statutory controls
- constraints and opportunities arising from the physical condition
- constraints and opportunities presented by the owner's requirements
- other opportunities identified in the context of the desired outcomes for the site.

The Mountbatten Group has local heritage significance. Accordingly, conservation should be an integral part of the management of the place and should follow the principles contained in the Burra Charter.

This CMP builds on previous CMP management Policies and Schedules and the overarching Policies of the Heritage Management Plan (HMP) prepared by Niche for the Appin Colliery Ventilation Shaft No. 6 Project in 2010, for BHP Billiton Illawarra Coal.

The recommendations in the HMP are reproduced below:

- The sympathetic placement of new buildings and structures on the property should continue to be implemented throughout the construction and operational phases of the development.
- Sympathetic finishes and vegetation screening should be used to screen and separate the new buildings and structures from the heritage items.
- Vegetation clearing should be minimised and should not include historical plantings in the vicinity of the Moreton Park Mountbatten Group.
- A management plan for the construction phase of the project should be developed to describe the procedures for the discovery of suspected archaeological relics during the construction phase of the project; and to describe the procedures for heritage impact assessment in the case of unforeseen contingencies that may impact heritage significance beyond that assessed in this HMP (the HMP includes this construction management plan).
- As owners of the heritage items BHP Billiton Illawarra⁸⁵ should manage and conserve the Mountbatten Group in a manner consistent with its heritage values.

⁸⁴ GB&A 2012; Niche 2020.

⁸⁵ Illawarra Coal Holdings Pty Ltd

5.2 CONSTRAINTS AND OPPORTUNITIES

5.2.1 CONSTRAINTS AND OPPORTUNITIES ARISING FROM STATUTORY CONTROLS

The Mountbatten Group is located in the vicinity of the Appin Ventilation Shaft No. 6 project, part of the Bulli Seam Operations project (BSO). State Significant Project Approval for the BSO (08_0150) was granted by the Planning Assessment Commission on 22 December 2011. The Appin Ventilation Shaft No.6 Project (10_0079), was granted State Significant Development Approval in May 2011, was incorporated into the BSO Approval as part of MOD 2 (2016). MOD 2 surrendered the earlier consent for Ventilation Shaft No. 6. The 2013 GB&A CMP was prepared to satisfy the requirements of Condition 22, under Schedule 3 Specific Environmental Conditions (10_0079) for the management of historic heritage. The Statement of Commitments for Surface Projects in the BSOP approval contains commitments to manage and conserve the Mountbatten Group in accordance with the CMP.

The *Heritage Act 1977* affords statutory protection to those items identified as having heritage significance and which form part of the NSW heritage record. The Act defines a heritage item as “a place, building, work, relic, moveable object or precinct”. Items that are assessed as having State heritage significance are listed on the NSW State Heritage Register (SHR). Proposals to alter, damage, move or destroy heritage items listed on the SHR (or protected by an Interim Heritage Order), require an approval under section 60 of the *Heritage Act 1977*. The site is not listed on the SHR.

Archaeological features and deposits are afforded statutory protection by the ‘relics’ provisions of the Act. A relic is defined as “any deposit, artefact, object or material evidence that relates to the settlement of the area that comprises NSW, not being Aboriginal settlement, and is of State or local heritage significance”.

Land disturbance or excavation that will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed is prohibited under the provisions of the *Heritage Act 1977*, unless carried out in accordance with a permit issued under section 140 or section 139 of the *Heritage Act 1977*. The EP&A Act establishes the framework for cultural heritage values to be formally assessed in the land use planning process in NSW. The EP&A Act also requires local government agencies to prepare planning instruments, such as LEPs, to provide guidance on the level of environmental assessment required. The site is listed as a local item on Wollondilly Shire Council LEP 2011 (Item 72, Mountbatten Group—house, chapel and garden building).

Table 13. Summary of key constraints and opportunities arising from statutory controls

Constraint Arising from Statutory Controls	Opportunity Arising from Statutory Controls
Historical heritage sites, items and relics protected under the Heritage Act are required to be protected, conserved and maintained and may not be altered without prior assessment and consent	An opportunity exists to enhance the management framework and heritage value of the Mountbatten Group through further assessment (archaeological), research and conservation measures. Such studies and works could engage with students, heritage professionals and the public and further understanding and appreciation of the heritage asset.

5.2.2 CONSTRAINTS AND OPPORTUNITIES ARISING FROM THE PHYSICAL CONDITION

The subject buildings are in an un-occupied state. Built fabric elements are in good to poor condition across the Main House complex and cottage. The Stable building is in good condition overall and stands as an exemplar of conservation and management of a heritage asset. From a ruinous state the building

has been restored and repaired by specialists in a considered manner that is aligned with the principles and guidelines for heritage management and maintenance in NSW.⁸⁶

The remaining buildings that form the Mountbatten Group are in a generally fair to poor condition overall, suffering a diverse range of issues common to 19th century structures including substantial foundational movement, damp and pest affected timber members and the decay of weak-bodied masonry.

The main issues identified in previous iterations of this CMP⁸⁷ included termite damage to the roof structure and joinery, and damp issues in the North Wing. Since that time the most rapid advancement of deterioration has taken place across the roof structure, due to these factors but also deteriorating weather-proofing across the entire roof of the Main House. Weather-exposed roof sections have been identified over the Bathroom 2, Bedroom 1 and Kitchen/Store areas of the Main House that are accelerating timber decay and masonry cracking, as well as over the Kitchen/Store room area at the junction of the Main House and South Wing (Refer to **Table 5**). The general decline in roofing members, many of which were replaced as recently as the 1980s has been recognised as both a safety and maintenance issue by the proponent, who undertook structural engineering assessment in 2017⁸⁸ resulting in remedial propping of the entire ceiling of the Main House. This remedial propping remains in place.

5.2.3 OWNER'S REQUIREMENTS

The mining uses in the vicinity of the site are expected to continue until 2041. Due to the restricted nature of public access on mining tenements few current uses are practicable for the site,

During the period of operation GM³ (and formerly South32) are endeavouring to undertake necessary and desirable conservation works across the heritage asset as required and as funding becomes available. Conservation works have already been completed for the Stable building

Works undertaken in full for the Stable building in observance of the Policies of the 2012 and 2020 CMPs were completed in 2021 at a cost of approximately \$350,000. The outlay of such sums for conservation works requires careful planning and consideration when applied to buildings with no current ongoing use.

As the buildings are currently in an unoccupied state of care and maintenance, the proponent intends that future conservation works will be tailored toward conserving significant fabric and carrying out works that serve to mitigate against deterioration. That is, remediation that best ensures the integrity of the buildings is maintained throughout the life of mine timeframe to 2041. Future conservation and remediation strategies and priorities are to be guided by the Maintenance Plan that accompanies this CMP (**Appendix A**).

⁸⁶ NSW Environment and Heritage, 2025, Heritage Maintenance Guides: Technical guides for conserving, repairing and using heritage items. <https://www2.environment.nsw.gov.au/topics/heritage/manage-heritage-items/heritage-maintenance-guides>

⁸⁷ GB&A 2012; Niche 2020.

⁸⁸ Inglis Engineering Pty Ltd, 2017, Temporary Propping.

Table 14. Constraint and opportunities arising from owner's requirements.

Constraint Arising from Owner's Requirements	Opportunity Arising from Owner's Requirements
Elements of the Mountbatten group heritage item are in a deteriorated state by virtue of their age and fabric. Management of the Mountbatten Group in accordance with NSW Heritage policy and guidelines and the principles of the Burra Charter requires the allocation of funds, planning and resources to achieve effective management.	Due to the mothballed nature of the former homestead, the site presents a favourable setting for carrying out ongoing, staged conservation works developed and implemented over time in response to this CMP and specialist advice. The lack of use of the site other than for grazing also favours the long-term retention and protection of the place within its setting – a key consideration of the principles of the Burra Charter.

6 CONSERVATION POLICIES

The development of conservation policies is essential before making decisions affecting a place of heritage significance. The conservation policies in this section consider the assessment of heritage significance and the opportunities and constraints in this CMP (Sections 4 and 5 respectively).

The Burra Charter provides the definitions used to describe the conservation processes and recommendations in this section (a Glossary is provided at the beginning of this CMP). It should be noted that these conservation processes are rarely applied in isolation. Conservation usually involves several methods in combination.

6.1 CONSERVATION POLICIES

The following policies have been developed for the Mountbatten Group.

6.1.1 MANAGING THE PLACE IN ACCORDANCE WITH BEST PRACTICE CONSERVATION METHODS

1. The Mountbatten Group should be managed in accordance with the principles and the methodology contained in the Burra Charter.
2. The current consent for the wider mine site does not easily support an ongoing use for the heritage complex during the occupancy of GM³. Nonetheless, adequate resources should be made available for the ongoing conservation and security of the place.
3. For the foreseeable future the buildings and setting are to be made secure, pest control measures are to be continued and weather proofing maintenance should be implemented. An ongoing inspection regime should be implemented to avoid loss of fabric. Essential Works as specified in the Maintenance Plan should be prioritised in order to achieve these aims. Should circumstances change at any time then the following principles should be followed in establishing a suitable use for the buildings and site.

6.1.2 IMPLEMENTING AND REVIEWING THE CMP

4. The CMP should be adopted as the principal document used to guide future decisions affecting the Mountbatten Group site.
5. Conservation Policies of this CMP should be reviewed every five years or whenever a major upgrade of the buildings and/or works within the curtilage boundary are considered. This should entail review of the current document by a suitably qualified heritage consultant. Should the CMP be found to require revision or updating as a result of a five-year review, a new CMP document may be required to be prepared.
6. The Maintenance Plan should be reviewed, in tandem with the review of the CMP Policies, to ensure it remains relevant in its approach.
7. This CMP and relevant documentation should be made publicly accessible with copies provided to Wollondilly Shire Council Library.

6.1.3 MAKING DECISIONS IN ACCORDANCE WITH THE LEVEL OF SIGNIFICANCE

7. The general guiding principle to manage the place is to protect and conserve the elements of the place that most clearly contribute to its significance. In consequence, conservation activities, as defined in these policies, are to be tailored to the assessed level of significance set out in **Section 4** of this report.

8. Any work, which affects elements with a High assessed heritage value, should be confined to preservation, restoration, reconstruction and adaptation, as defined in the Burra Charter, and should be carefully considered.

9. In relation to elements of Moderate significance, the principles of the Burra Charter should be followed as above; work involving the reduction (or even the removal) of a particular element of Moderate significance, may be an acceptable option, where it is necessary for the proper function of the place and is beneficial to, or does not reduce, the overall significance of the place.

10. Elements with Little assessed heritage value are of slight significance and do not intrude on the place in a way that reduces significance. Both retention and removal are acceptable options.

11. Intrusive elements are those elements which reduce the overall significance of the place, despite their role as illustrations of continuing use. The preferred long-term option is for their removal, conversion to a compatible form of replacement or a way which helps retain the significance of the overall item.

6.1.4 CONSERVING THE MOUNTBATTEN GROUP, INCLUDING ITS SETTING

12. The Mountbatten Group, including its setting, should be retained, protected and conserved as part of any appropriate use or in any adaption for re-use.

13. Uses that respect and maintain the visual relationships between the buildings that make up the Mountbatten Group within the heritage curtilage should be encouraged.

14. The understanding and significance of the Mountbatten Group is intrinsically linked with conserving its open rural setting. This involves protecting the relationships between the buildings and the views of the site from afar, as well as maintaining the open character around the buildings. The primary means of doing this is through the retention of an appropriate curtilage. The existing heritage curtilage should be retained.

15. The Main House has retained a high degree of original form and architectural character, although changes and renovations have resulted in the removal of original internal finishes and fittings. The Main House complex and its constituent parts should be retained and conserved in line with the policies of this CMP.

16. The Cottage building would meet the threshold for an individual listing, were it not already part of a group listing. The Cottage has been substantially altered over time, however remnant spaces and fabric dating from the 19th century, including the sandstone and brick work, the cellar, and original detailing, are of high significance and should be conserved. The sandstone and brick fabric, including the cellar space, and evidence of original opening patterns and detailing should be conserved and protected. It is acceptable and desirable to remove all later building stages and reroof the structure in order to best retain, present, protect and conserve the built fabric.

17. The Stable would meet the threshold for an individual listing, were it not already part of a group listing. The Stable has been expertly conserved and should be retained, protected and maintained in its current condition and within its open rural setting.

6.1.5 CONSERVING THE BUILDINGS

18. Priority, Essential Works identified as key to conservation of the built fabric should be carried out to prevent future loss of fabric. Essential Works identified are outlined in **Appendix A**.

19. Regular maintenance inspections and actions should be undertaken and recorded in accordance with the Maintenance Plan. New materials or new finishes may only be introduced where this does not impact

the significance of the item, uses a colour sympathetic to the item, does not detract from the item and does not reduce the ability to appreciate the item.

20. In addition to regular maintenance activities, prompt preventative action and repair should be taken as necessary. Should any kind of work be required on the fabric of the heritage buildings or setting, the applicable principles contained in Section 6.0 of this CMP should be adhered to.

21. Priority for conservation should be assessed primarily according to relative degree of significance. However, public safety is paramount, and works should be prioritised to minimise risks.

22. In order to reinstate, or reconstruct parts of the building, sufficient information must be available to guide the design and documentation of the work. Such information includes assessment of structural integrity, an understanding of the built fabric and appropriate, best practise conservation guidelines, including the Heritage NSW Heritage Maintenance Guides.⁸⁹

23. Competent direction and supervision of any restoration works should be maintained at all stages, and any work should be implemented by professionals and/or tradespeople with appropriate conservation experience and knowledge of traditional building skills. Where any significant fabric or spaces are to be disturbed in the process of restoration works, the advice of a suitably qualified heritage specialist is to be sought and implemented.

24. Damaged fabric should be repaired by suitably skilled and / or qualified tradespersons.

25. Traditional methods and materials are preferred for repairs or reconstruction, preferably those already used on the site.

26. Information describing the required 'stop work and notify' procedure should form part of all induction information for those working on or around the site. Records should be kept in accordance with GM³ safety and recording procedures.

27. Should any unexpected evidence of historic heritage items be encountered during works at the site or in the vicinity, works should cease in the affected area, and a suitable heritage specialist should be consulted to undertake an assessment and to advise on appropriate action.

28. Based on the findings of this CMP, the buildings are in poor to good condition overall and it is important that affected elements do not fall into further disrepair. Conservation approaches and priorities are outlined in the Conservation Plan (**Appendix A**).

29. Where repairs to the buildings are required, original fabric should be retained where possible.

30. Repair/replacement of roofing material, including all supporting structure, lashings and stormwater connections is to be replaced with similar in material specification, colour, finish, detail, size and profile. Where the reconstruction of an original detail will cause damage or future loss of fabric it is acceptable to provide an alternative. The design of a proposed alternative should be considered in conjunction with a suitably qualified heritage consultant.

31. The existing buildings demonstrate a mix of rendered and face brickwork and sandstone. Significant face brick or stone fabric, originally unpainted or finished with limewash should remain, or if requiring sealing due to deterioration, be refinished with limewash. Elements that were originally painted may be repainted only as necessary to prevent deterioration.

⁸⁹ NSW Environment and Heritage, 2021, Heritage Maintenance Guides
<https://www2.environment.nsw.gov.au/topics/heritage/manage-heritage-items/heritage-maintenance-guides>

32. The timber floor in the Main House is not original and is in a deteriorated state. If the floors are to be replaced in future floorboards, fixings and finishes should be selected that are in keeping with the context of the house.

33. Wherever sandstone flagging, thresholds, setts and sandstone well elements are found they should be conserved. The stone paving to the Courtyard may not be original, however it is sympathetic to the general character of the Main House and its retention is desirable.

34. It is not acceptable to install concrete slabs within the footprint, or immediately adjacent to the heritage buildings.

35. Significant timber joinery and hardware should be conserved wherever possible, including, but not limited to: timber joinery, including original windows and doors; door and window joinery and architraves.

36. The correct use of colour is a most important aspect in the restoration and interpretation of old buildings. The current scheme of the Main House is believed to generally date from the 1980s. Future colour schemes should be based on physical and documentary research having regard to the significant period(s) of the individual buildings. The current colour schemes for the Mountbatten Group of buildings is neutral and does not appear to relate to any specific period. It may be retained or replaced with another appropriate colour scheme when required, preferably in tandem with restoration of traditional render finishes that allow the masonry to breathe and support the ongoing conservation of masonry.

37. While reconstruction or reinstatement should return an element to a known earlier state, reinstated or reconstructed fabric should be 'date stamped' in discreet ways, to indicate the work is of this nature.

38. Care should be taken to ensure that sites are left in good condition after construction works. Contractors engaged in conservation work should be required to clean up and remove all surplus materials such as cement, adhesives, drop sheets and packaging materials when they have completed their work.

6.1.6 CONSERVING THE GARDEN AND LANDSCAPE

39. The garden and grounds should continue to be maintained in a suitable manner that conserves the original layout and enhances the setting. Screening and hedge plantings should be maintained at a suitable height in keeping with their intended purpose and to allow views to and from the heritage item.

40. The dovecote, cistern and other built elements of the grounds do not meet the threshold for individual listings, however they form contributory elements of the Mountbatten Group and should be conserved.

41. Decisions on whether to retain or remove particular trees should be based on their significance, safety, amenity value and contribution to the landscape as a whole. In practise, these works should conform to relevant Australian Standards and current best practice in arboriculture. Any potential impact on archaeological material by stump grinding or ground disturbance should also be assessed by a suitably qualified consultant.

42. Weeds and problem species including self-sown woody species should be controlled and / or removed under ongoing maintenance programs. The outline of historical plantings presented in **Section 3.3.2** and **Figure 19** within this CMP should inform the management of plantings within the curtilage.

43. Given the importance of the views to, from and within the site, particularly to the east and west, new development, including any plantings should be selected and located in such a way that they enhance views, not block or detract from them.

44. Any new plantings / gardens should be designed in keeping with existing significant landscape elements, with design and materials consistent with, or at least not in conflict with, that particular part of the place. Conservation of heritage places, particularly landscapes, inevitably involves change as plants go through their life cycle. It is important that the limits of acceptable change be defined prior to major works.

45. The choice of species for new plantings should be based on the relative significance of the area, appropriateness for the period, suitability for the location, ease of maintenance and use (e.g. screening, visitor control, floral display). The placement and selection of larger specimen trees should be carefully planned to avoid root damage, blocking of views, inappropriate mature dimensions, or incompatibility with the established character of the landscape.

46. The presence of any rodents, possums or burrowing animals should be monitored, and any adverse impacts on significant items recorded.

47. Services and utilities such as water supply, drainage, power and phone should be provided in a manner which poses minimal environmental impact on the historic fabric or aesthetic qualities of the landscape.

48. Receptacles for on-site storage of rubbish, garden waste, landscape materials (e.g. mulch, compost) and building materials should be carefully located having regard to significant elements/elevations.

49.

50. Weeds should be subject to a staged control program over many years, using well-established methods including manual removal and targeted use of approved herbicides. Noxious weeds, as listed in the noxious weed declarations for the Wollondilly Shire Council local government area, must be controlled in accordance with the declaration (for current declarations see www.dpi.nsw.gov.au). Weed problems are most likely to include self-sowing African Olive, agricultural weeds and common local weeds of lawns and garden beds. These can be controlled by routine removal, mowing, mulching and weeding programs.

African olives, traditionally grown as a hedge, produce large quantities of seed and tend to become invasive. While they form part of contributory plantings at Mountbatten and effectively screen adjoining development from view, their invasiveness means they require monitoring, regular pruning to reduce lowering and fruiting and removal of self-sown specimens. A future change to the weed classification of this species may necessitate its possible replacement with less invasive species with similar habit and other characteristics. Weeds and plants likely to require control measures include but are not limited to the following:

Table 15. Weed and aggressive plant species that may be problematic for the management of the garden and grounds.⁹⁰

Scientific Name	Common Name
<i>Olea europaea ssp. africana</i>	African Olive
<i>Celtis spp Nettle Tree,</i>	Nettle Tree, Hackberry
<i>Ochna serrulata</i>	Mickey Mouse Plant

⁹⁰ After GB&A 2012; Niche 2020

Scientific Name	Common Name
<i>Lantana camara</i>	Lantana
<i>Ligustrum lucidum</i>	Large-leaved Privet
<i>Ligustrum sinense</i>	Small-leaved Privet
<i>Rubus fruticosus sens. lat.</i>	Blackberry
<i>Tradescantia albiflora</i>	Trad, formerly Wandering Jew
<i>Asphodelus fistulosus</i>	Onion Weed
<i>Oxalis species</i>	Oxalis species
<i>Bidens pilosa</i>	Cobblers Pegs
<i>Acetosa sagittata</i>	Turkey Rhubarb
<i>Anredera cordifolia</i>	Madeira Vine
<i>Ricinus communis</i>	Castor Oil Plant
<i>Ageratina adenophora</i>	ora Crofton Weed
<i>Solanum species</i>	Nightshade
<i>Verbena bonariensis</i>	Purpletops
<i>Carduus spp., Sonchus spp.</i>	Thistles
<i>Sida rhombifolia</i>	Paddy's Lucerne
<i>Taraxacum officinale</i>	Dandelion
<i>Hypochaeris spp.</i>	Catsears, Flatweeds

6.1.7 INTERPRETING THE SITE

51. An Interpretation Plan should be prepared for the place when an appropriate use is found for the site. These documents should be reviewed in tandem with the review of the CMP Policies and the Maintenance Plan, to ensure they remain relevant in their approach.

6.1.8 ON-GOING PROTECTION AND MAINTENANCE

52. The property may be left unoccupied during the life of the mine, a nominated individual should be appointed by GM³ who is responsible for initiating and overseeing all aspects of the care of the heritage buildings and their setting.

6.1.9 PRINCIPLES OF RE-USE AND NEW DEVELOPMENT

53. Uses that respect and maintain the open character surrounding the buildings and the functional and visual relationships between the buildings within the heritage curtilage should be encouraged.

54. During preparation of schemes for future uses for the buildings, care should be taken to respect the scale and character of the buildings, including interior spaces and external openings. The relationships between the buildings should also be respected and retained.

55. When considering potential new uses for each building the fragile condition and requirement for protection of significant fabric should be taken into consideration. Areas of high traffic should be kept to areas with sufficiently robust structure and finishes to avoid loss of or damage to heritage fabric.

56. New uses that are selected for any particular internal space should adopt the principle of 'loose fit' whereby the functional and spatial requirements of each use are tailored to suit the available space, any approach that alters the building to suit the requirements of the new use should be avoided.

57. Where significant spaces have been altered, it is desirable to reinstate an earlier configuration should the opportunity arise, and if it is compatible with a proposed new use. Any changes should be based on firm evidence of earlier configurations.

58. Location and visual presentation of new services within the buildings should generally remain subservient and respectful to the scale, dignity and presentation of the existing buildings. New services should be designed to minimise impacts on significant fabric.

59. Where possible, damage or scarring caused by earlier fit-outs or service installations should be repaired to match the original or original fabric reinstated if possible.

60. New internal elements should be of a contemporary design and character and should not attempt to replicate the original features.

61. Should the provision of air conditioning units for the Main House be considered the system should be designed so as to minimise any visual impacts, from ground level as well as from afar. Intrusion into significant fabric should be avoided in the installation of any new air conditioning services. Plant situated on the roof should be designed to have a minimal impact on appreciation of the roof structure in terms of finish and configuration.

62. Proposals to upgrade the environmental efficiency of the services infrastructure should consider a whole building approach and be considered for their physical or visual impact on the spatial and architectural attributes of the building in its own right.

63. If any new structures are required within the curtilage their design and siting must be planned to maintain the visual relationships between the building group. Any proposals are to be carried out in conjunction with a Heritage Consultant with proven landscape experience.

6.1.10 ARCHAEOLOGY

64. The historical archaeological potential and significance of the Mountbatten Group has not been assessed previously. Should any future change occur within close proximity of the Mountbatten Group structures (within 50 m) that may require ground disturbance works, including underpinning of buildings as part of conservation works, a Historical Archaeological Assessment should be prepared to inform the works and provide an overarching framework for potential archaeological resources within the curtilage.

65. Should any unanticipated archaeological resources be identified within the curtilage through natural erosion or other means, a suitably qualified archaeologist should be engaged to assess the find.

66. Management of any archaeological resource associated with the Mountbatten Group shall be undertaken in accordance with any recommendations or consent conditions of an Excavation Permit required under the provisions of the *NSW Heritage Act 1977*.

67. Regardless of whether a use is found for the heritage buildings during the life of the mine, GM³ will be responsible for informing all staff and independent contractors carrying out maintenance in the

garden, and the area within the curtilage generally, of the potential for archaeological discoveries. This also applies to the forming of additional roads, pathways or service structures required to be built.

6.1.11 ACCESS

With regard to future uses, the *Commonwealth Disability Discrimination Act 1992* (DDA) requires that reasonable adjustment be made to premises the public are entitled to use in order to be accessible to persons with a disability. The original siting and design of the buildings which make up the Mountbatten Group at Morton Park may be a barrier which prevents full compliance with the provisions of the DDA.

Any changes to the site required to improve the public access should also be made in accordance with the other policies in this CMP. The Fire, Access and Services Advisory Panel of the NSW Office of Environment and Heritage can provide formal advice on ways of achieving acceptable compliance with access requirements while retaining the heritage significance of the place. If strict adherence to the provisions of the DDA is likely to have an adverse heritage impact on significant fabric this may be considered unjustifiable hardship under the terms of this Act.

7 IMPLEMENTING THE PLAN

This CMP has been prepared to provide guidelines for the protection and conservation of the Mountbatten Group at Morton Park and to ensure that the heritage value of the place is protected, maintained and enhanced.

This section sets out the implementation guidelines for the policies, including a list of management approaches. Conservation schedules for maintenance works are outlined in **Appendix A**.

7.1 MANAGEMENT PRINCIPLES

The current owners are to:

- Review and adopt this CMP, including the Conservation and Maintenance Plan (**Appendix A**)
- Submit copies of the CMP to be lodged with the State Library and Wollondilly Shire Local Studies Library
- Refer any development proposals to the relevant planning authority
- Ensure funding for care and control and works required to ensure the long-term protection and conservation of the built fabric and landscape.

7.2 OBTAINING DEVELOPMENT CONSENT

Any development proposals for all or part of the Mountbatten Group at Morton Park must be referred to the relevant planning authority for approval.

7.3 ON-GOING CONSERVATION AND MAINTENANCE PLAN

The on-going Maintenance Plan, included as Appendix A to this CMP, outlines priority and cyclical maintenance works required to ensure the fabric and landscape elements of the item are maintained. The Conservation and Maintenance Plan should be implemented by the owner as part of the process of on-going management of the site. A record of when major works are performed, and any faults discovered or repairs made, should be kept alongside a copy of the Conservation and Maintenance Plan (**Appendix A**).

REFERENCES

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APPENDIX A

THE CONSERVATION AND MAINTENANCE PLAN

Table 16 below sets out the framework for implementing actions for the Mountbatten Group Conservation and Maintenance Plan (**Table 17 -**

Table 22).

Where major, structural works are proposed for significant fabric that may impact upon the overall significance of the item, such (Level 1) works require consent from Council and assessment, execution and documentation by suitably qualified specialists.

Where minor works involving the maintenance or repair of fabric are proposed, these (Level 2) works can be undertaken in accordance with Council's exemptions (Minor Works not requiring a Development Application)⁹¹ by qualified tradespersons with reference to the NSW Heritage Maintenance Series⁹² and other relevant NSW heritage guidelines.

Table 16. Action Protocol Ratings and their definitions as relevant to the Maintenance Plan.

Action Protocol Rating	Definition
Level 1 – Major works are proposed for repair or restoration of the heritage item that may impact upon significant fabric and/or the overall significance of the heritage item	Likely to require development consent from Wollondilly Council. A suitably qualified specialist must be engaged to carry out the works, and must: • assess the problem and its cause • prepare a specification and schedule of repairs • prepare a methodology for the works including plans/elevations A concise Heritage Impact Statement should be prepared by a heritage consultant to assess the methodology, form and fabric outlined for the proposed works. The suitably qualified specialist must undertake all work with reference to the standards and practises outlined within the NSW Heritage Maintenance Series and must document all works undertaken; documentation should be of a standard and level of detail suited to the complexity of the works and as guided by recommendations of the Heritage Impact Statement (e.g. a restoration report)

⁹¹ Wollondilly Shire Council 2020. Heritage Information Pack. www.wollondilly.nsw.gov.au/assets/Documents-NEW/Planning-and-Development/Heritage-Conservation/Heritage-Information-Pack.pdf

⁹² NSW Environment and Heritage 2025. Heritage Maintenance Guides

<https://www.environment.nsw.gov.au/topics/heritage/manage-heritage-items/heritage-maintenance-guides>

Action Protocol Rating	Definition
Level 2 – Works are proposed in accordance with the Maintenance Schedule that will not impact significant fabric or the overall significance of the heritage item	Not likely to require development consent. A suitably qualified professional must be engaged to carry out the minor works. Minor works must conform to those outlined by Wollondilly Shire Council,⁹³ Such works include but are not limited to: • replacing broken windows, flyscreens etc • minor repairs to roofing, brickwork, timberwork and metal work • renewing metal roofs, gutters and downpipes in galvanized finish • repainting, in the original colour, surfaces which are already painted including timberwork and metalwork • patching, painting and decoration to the interior and installation of joinery items • repairing timber floors • plumbing or gas fitting work • electrical work and communications cabling • installation of insulation All work should be undertaken with reference to the standards and practises outlined within the NSW Heritage Maintenance Series.⁹⁴ A record of such works should be kept by the proponent. Documentation may be basic or detailed depending on the nature of the works undertaken. Where minor works could affect significant fabric, practitioners should conduct the work with reference to NSW Environment and Heritage standards and guidelines for documenting maintenance and repair work.⁹⁵

⁹³ WSC 2020. Heritage Information Pack.

⁹⁴ NSW Environment and Heritage 2025. Heritage Maintenance Guides

⁹⁵ NSW Heritage Office 1998. Heritage Maintenance: Documenting Maintenance and Repair Works.
<https://www.environment.nsw.gov.au/publications/heritage-maintenance-documenting-maintenance-and-repair-works>

Table 17. Conservation and Maintenance Plan: Main House Complex – brick masonry structures

MOUNTBATTEN GROUP CONSERVATION AND MAINTENANCE PLAN Appendix A: Mountbatten Group Conservation Management Plan 2025 						
Main House Complex						
Main House (and Wings) Exterior:						
Building Element	Details	Condition & Integrity	Grading of Significance	Required Maintenance Action	Action Priority	Action Protocol
Roofing	Slate roof, including lead flashings over Main House including Southern Wing	Poor to Fair	High	Remedial repairs required. Roof is not safe to work on, but inspection, repairs and waterproofing are required. These include inspection of slates and repair/replacement of lifting or missing flashings.	Essential works	Level 2
	Timber roof members		High (Phase 2) to Little (Phase 4)	The building is not currently suitable for use. Any future repair of roof members to facilitate a planned future use would require assessment by a structural engineer and a comprehensive strategy for repair and rehabilitation	As required for any planned future use	Level 1
	Corrugated Iron roofing on North and South Wings and Phase 4 Northern Extension	Poor to Fair	Little	Remedial repairs may be required. Roof is not safe to work on but inspection, repairs and waterproofing is required from a scissor lift or	As soon as practicable	Level 2

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Appendix A: Mountbatten Group Conservation Management Plan 2025



				scaffolding. Any deficient, corroded or leaking roof nails or sheeting should be replaced.		
	Roof plumbing	Poor to Fair	Little	Remedial repairs required. Guttering needs replacing where corroded through. Ensure all effective falls and connections are maintained. Affected fascias and eaves linings should be repaired/replaced.	Essential works	Level 2
Walls	Rendered and limewashed masonry	Fair to Good	High	Traditional limewash is the preferred finish for early masonry walls as it allows the brickwork to breathe. Limewashed render remains beneath modern paint. Ensure walls are kept dry, i.e. maintain roof and roof plumbing, avoid garden bed build up. Inspect walls annually for render shedding – patch or replace render with appropriate mortar and limewash if required due to render failure. If entire replacement proves necessary, do not paint but finish with pigmented limewash to match existing.	Annual inspection	Level 2
	Cement rendered and painted masonry	Poor to Good	Moderate	Where original walls have been rendered with later inappropriate, impermeable, cement mortar render this should not be removed due to likely damage to masonry. Ensure walls are kept dry, i.e. maintain roof and roof plumbing, avoid garden bed build up. Inspect annually for peeling/bubbling paint. Remove paint and inspect render to confirm fabric and condition if paint is lifting.	Annual inspection	Level 2

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Appendix A: Mountbatten Group Conservation Management Plan 2025



External Joinery	Verandah posts, beams, windows, doors and trims, eaves linings and the like.	Poor to Good	Moderate to High	Rotten eaves and fascias need repair/replacement once roof plumbing repaired	Essential Works	Level 2
				Maintain door hinges, hardware and locks for security	Regular inspection (Every 2 years)	Level 2
				Monitor for termite reinfestation or signs of moisture or other agents of deterioration of timber, including peeling paint and dry rot	Regular inspection	Level 2
				Monitor for reinfestation or signs of accelerating deterioration of timber, including peeling paint and dry rot	Regular inspection	Level 2
				Maintain a protective paint finish on all painted timber surfaces.	Annual inspection	Level 2
Chimneys	Rendered and painted with mouldings at high level.	Good	High	Monitor for movement and stability.	Annual Inspection	Level 2
Courtyard	Sandstone pavers, 'Crazy paving' pattern. -Sandstone brick lined well	Good	High	Keep weeds out of joints between stonework to avoid displacement	Annual inspection	Level 2
	Painted timber Courtyard doors	Good	Moderate to High	Maintain door hinges and locks for security	Annual inspection	Level 2
				Repaint when required to protect	Regular inspection	Level 2

MOUNTBATTEN GROUP CONSERVATION AND MAINTENANCE PLAN

Appendix A: Mountbatten Group Conservation Management Plan 2025



Courtyard wall (south)	Rendered and painted brick wall containing three arches, showing evidence of movement, cracks and prior rectification.	Poor	Moderate	Monitor severe cracking for further deterioration/apply crack gauges. Future assessment of unacceptable safety risk or loss of fabric may warrant reconstruction or other remediation	As soon as practicable As required	Level 2 Level 1
	Metal palisade gates to each of the arches	Good	Moderate	Inspect for rust, paint/seal as required	Annual inspection	Level 2
Verandah	Decking and members	Good	Moderate	Maintain decking and members in good order. Do not disturb potential archaeological relics below decking	Regular inspection	Level 2
	Awning and support posts	Fair to Good	Moderate	Repair/ repaint when required to protect	Annual inspection	Level 2
Main House complex						
Main House (and wings) Interior:						
Walls	Overpainted masonry/wallpaper/ /render and set.	Good	Moderate	Monitor for signs of moisture/ separation from masonry Paint only as required to prevent deterioration	Regular inspection	Level 2
	Painted plasterboard	Poor to Good	Little	Paint only as required to prevent deterioration	Regular inspection	Level 2
Doors and Windows		Fair to Good	Moderate to High	Monitor for termite infestation, damp and dry rot. Retain all original glazing and hardware	Regular inspection	Level 2

MOUNTBATTEN GROUP CONSERVATION AND MAINTENANCE PLAN

Appendix A: Mountbatten Group Conservation Management Plan 2025



	Painted timber French doors and six panel doors Sash windows and later windows	Good	Little to High	Monitor for termites, damp, and dry rot	Regular inspection	Level 2
Architraves and skirting	Painted timber, including reveal to French doors	Poor to Fair	Moderate	Monitor for termites, damp, dry rot	Regular inspection	Level 2
Floor	Polished timber floor	Poor to Fair	Little	Monitor for termites, damp and dry rot.	Regular inspection	Level 2
				Consider future replacement for any planned future use	As required	Level 1
Ceilings	Possible lath and plaster in various rooms	Fair to Good	High	Retain propping. Following repair of roof monitor all ceilings for water damage. Retain any lath and plaster ceilings that may remain	Regular inspection for slumping, moisture damage	Level 2
	Plasterboard ceilings	Fair to Good	Little	Retain propping. Following repair of roof monitor all ceilings for water damage. Repair/paint only as required	Regular inspection for slumping, moisture damage	Level 2

Table 18. Conservation and Maintenance Plan: Main House complex – sandstone masonry structures

MOUNTBATTEN GROUP CONSERVATION AND MAINTENANCE PLAN Appendix A: Mountbatten Group Conservation Management Plan 2025 						
Main House complex						
Sandstone Kitchen Building						
Chimney	Sandstone, rock-faced chimney external to west wall	Poor to Fair	High	Chimney has undergone tilting and rotation away from wall. Ongoing monitoring indicates the structure is currently stable. Monitor for further movement	Regular inspection	Level 2
				Monitor severe cracking for further deterioration/apply crack gauges.	Regular inspection	Level 2
External Walls	Clean face and rock-faced sandstone masonry, pointed with cement composite mortar	Good	High	Retain in current condition, monitor for movement/moisture	Regular inspection	Level 2
Doors and Windows	Four-panel door, no mouldings.	Good	Moderate	Monitor for termites, retain all original glazing and hardware, paint only when required to conserve	Regular inspection	Level 2
	Sash windows (painted timber)	Good	Moderate	Monitor for termites, damp, dry rot. Paint only when required to conserve	Regular inspection	Level 2
Architraves and skirting	Timber, stained.	Good	Moderate	Prepare and re-stain coffered ceilings and reveals.	As required	Level 2

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Floor	Timber floorboards, polished	Fair	Little	Prepare and repolish.	As required	Level 2
				If floor requires maintenance and lifting of floorboards the underfloor surfacing is to be documented. Monitor for termites, damp, dry rot	As required	Level 2

Table 19. Conservation and Maintenance Plan: The Cottage

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The Cottage						
Building Element	Details	Condition & Integrity	Grading of Significance	Required Maintenance Action	Action Priority	Action Protocol
Walls	Sandstock brick and lime mortar	Poor to Good	High	Brickwork is spalling/disintegrating in places – a common problem with early handmade, low-fired bricks, particularly in damp or poorly roofed buildings. Inspect roofing for leaks. Monitor walls for signs of moisture,	Annual inspection, do not remove or reapply contributory mortar and whitewash (in cellar)	Level 2
				White filling compound applied to sandstock masonry is undesirable and should be removed if possible without adversely impacting masonry.	As compatible with any future use/rehabilitation of the building	Level 2

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	Red-tinted cement render	NA	Little	Detracts from significance. Removal likely to damage masonry	Do not remove	NA
	Clean faced sandstone masonry, bedded with original shell lime mortar	Good	High	Sandstone masonry in good condition	Annual inspection Do not paint, monitor for movement/moisture	Level 2
Windows:	Phase 2b timber casement windows	Fair to Good	Moderate	Monitor for termites, retain all original glazing and hardware	Regular inspection	Level 2
Timber Members	Painted timber, including Phase 3 timber framing of openings cut into early brickwork	Good	Moderate	Monitor for termites, damp, dry rot	Repaint as necessary	Level 2
Cellar	Rendered/washed floor	Indeterminate	High	Monitor for damp, cracking of render, movement of underlying bricks (if present)	Annual inspection, do not remove or reapply contributory mortar and whitewash	Level 2
Sandstone surfacing	External rectangular sandstone paving	Good	Moderate	Keep weeds out of joints between stonework to avoid displacement	Annual inspection	Level 2
Phase 3 / Phase 4 Fabric	First floor and ground floor extensions in weatherboard, concrete, timber, fibro, tile and carpet.	Poor to Fair	Intrusive	Removal and replacement of all Phase3/Phase 4 structure and replacement with a period appropriate (simple gable or hipped) corrugated iron roof should be considered as a long-term conservation measure. A Heritage Impact Permit	As compatible with any future use/rehabilitation of the building	Level 1

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				(HIP) would need to be prepared for any such major alteration.		
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Table 20. Conservation and Maintenance Plan: The Stable

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Stable						
Building Element	Details	Condition & Integrity	Grading of significance	Required Maintenance Action	Action Priority	Action Protocol
Roofing	Recent corrugated iron reconstruction	Good	Moderate	No immediate maintenance required for new structure	Inspect at end of 5-year CMP review period	Level 2
	Roof plumbing	Good	Moderate	No immediate maintenance required for new structure	Inspect at end of 5-year CMP review period	Level 2
Walls	Rock-faced sandstone masonry, bedded with original shell lime mortar	Good	High	Interior masonry in good condition	Annual inspection. Do not paint, monitor for movement/moisture	Level 2
	Residual limewash on sandstone masonry	Fair to Good	High	Do not remove or refinish	Inspect at end of 5-year CMP review period	Level 2

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Joinery	Windows, doors and tack room linings	Good	Moderate	Maintain and inspect for infestation or decay	Annual inspection	Level 2
Timber Members	Loft floor joists, wall plates	Good	High	Maintain and inspect for infestation or decay	Annual inspection	Level 2
Sandstone Surfacing	Conserved and repointed sandstone floor setts	Good	High	No specific work required	Inspect at end of 5-year CMP review period	Level 2
	External rectangular sandstone paving	Good	Moderate	Keep weeds out of joints between stonework to avoid displacement	Annual inspection	Level 2

Table 21. Conservation and Maintenance Plan: Grounds and Garden – Built Fabric

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Grounds and Garden						
Built Fabric						
Building Element	Details	Condition & Integrity	Grading of significance	Required Maintenance Action	Action Priority	Action Protocol
Dovecote	Cement rendered masonry and terracotta tiled dovecote/aviary	Fair	Moderate	Minor remedial repairs required to roof structure Roof requires retiling in places.	Not urgent	Level 2

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Large Brick-lined Cistern	Brick lined cistern south-west of sandstone Kitchen with modern metal lid and electrified pump attached. Water in use by a neighbouring property.	Fair to Good	Moderate	No specific action required	Annual inspection	NA
Pet Memorials	Stone pet memorials/burial markers with plaques/inscriptions west of the dovecote and east of the carriage circle	Good	Moderate	No specific action required	Inspect at end of 5-year CMP review period	NA
Phase 4 Garage	Open-sided timber carport	Poor	Little	No specific action required	Inspect at end of 5-year CMP review period	NA
Concrete Slabs	Structural foundation slabs remaining from Phase 4 south of the cottage	NA	Intrusive	Removal recommended	Not urgent	Level 2

Table 22. Conservation and Maintenance Plan: Grounds and Garden – Plantings and Landscape Elements

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Grounds and Garden						
Plantings and Landscape Elements						
Element	Details	Condition & Integrity	Grading of significance	Required Maintenance Action	Action Priority	Action Protocol
Phase 2 Plantings	Various mature trees, outlined in Table 3 .	Good	High	No specific action required	Inspect condition/health at end of 5-year CMP review period	NA
Phase 2 Carriage Circle	Entry drive figure-of-eight carriage drive and drive encircling house	Good	High	No specific action required	Inspect condition at end of 5-year CMP review period	NA
Phase 3 Plantings	Majority of garden plantings	Fair to Good	Moderate	Weed control required for self-sowing African Olives	Annual inspection and regular weed management	Level 2
Later Plantings	Various shrubs and flowering plants	Good	Moderate	No specific action required	Inspect at end of 5-year CMP review period	NA
Tennis Court Flat	Former tennis court sunken flat to the north of the Main House	Good	Moderate	No specific action required	Maintain in current condition. Inspect at end of 5-year CMP review period	NA

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Former Farm Tracks	Former roads/tracks leading between areas of the curtilage, evident under the grass	Fair	Moderate	No specific action required	Maintain in current condition. Inspect at end of 5-year CMP review period	NA
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Appendix 9: Management Plan Approval

To be included when approved.