



Our ref: DOC20/132959

Mr Stephen Shoesmith  
Principal Policy Officer (Minerals Quarry Assessments)  
Department of Planning, Industry and Environment  
4 Parramatta Square  
12 Darcy Street  
Parramatta, NSW 2150

Letter uploaded to Major Projects Website

Dear Mr Shoesmith

**RE: Comments on Response to Submission report for Dendrobium Coal Mine Extension Project (SSD-8194)**

Thank you for your referral dated 19 February 2020 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) Response to Submissions.

On 8 October 2019, Heritage NSW, as delegate of the Heritage Council of NSW (the Heritage Council), provided comments relating to the proposed extension of underground longwall coal-mining operations into Area 5 and 6. These comments related to the following:

1. Longwall subsidence impacts within or near the SHR curtilage of Avon and Cordeaux Dams;
2. Built/visual impacts from the new ventilation shafts within or near the SHR curtilage of Avon and Cordeaux Dams;
3. Upgrade and expansion to existing infrastructure at the Dendrobium Pit Top (located within the Nebo Colliery archaeological site; and
4. Subsidence and vibration monitoring.

The following document was reviewed to provide comment in this letter (RTS report):

*Dendrobium Mine – Plan for the Future: Coal for Steelmaking, Submissions Report*, prepared by South32, dated February 2020.

The following comments are provided to address the applicant's response to the heritage issues raised:

- The Heritage Council recommended the relocation of the project areas outside of the SHR curtilages of Avon and Cordeaux Dams, however it is noted that this recommendation has not been addressed. The Heritage Council reiterates its assessment that subsidence could potentially radically alter the built and landscape elements within these SHR curtilages, resulting in unknown, irreversible and unacceptable impacts from ground subsidence and surface fracturing upon the SHR items.
- The RTS report notes that a minimum 1km setback exists from any longwall extraction to the dam wall structures, and 300m setbacks from the Full Supply Levels which encompass a large portion of the curtilage areas of the reservoirs.

- The Heritage Council requested that Figure 5 of the HHA was amended to correctly show the SHR curtilage of Cordeaux Dam. This has not been provided in the RTS report.
- The RTS report does not provide clarification as to the location of the proposed ventilation shafts in relation to the SHR items or to the visual representation of these shafts. The report suggests that the shafts would be visible from the dam walls during construction, while it also states that these views would be obscured by vegetation during the operational stage of the project. Even though the report subsequently states that these shafts would not result in adverse impacts on the visual amenity or heritage values of the Avon and Cordeaux dam walls, insufficient information has been provided to the Heritage Council to assess these impacts. No further clarification has been provided in relation to the impact of the ventilation shafts upon view points, other than from the dam walls.
- The RTS report advises proposed works to the Dendrobium Pit Top (which includes the LEP listed Nebo Colliery) would be designed to reduce potential impact to the values and significance of both the Nebo Colliery and the Kembla Heights Mining Village. However, the RTS does not set out what the impacts will be to the values of these places. Heritage NSW supports the preparation of a Conservation Management Plan to clearly identify the significance of these places and establish policies for their ongoing management. The project should then apply those policies when managing these historic mining sites in the new mining facility (Dendrobium Pit Top). Heritage NSW advises any CMP prepared should not be used simply to justify changes to the old mining infrastructure to accommodate the new mine workings.
- Changes to accommodate the new mining infrastructure for the Dendrobium Pit Top Mine must respond sympathetically to the existing heritage values of the Nebo Colliery and Mt Kembla Mining Village archaeological sites.

Please note that in 2019, the Heritage Council of NSW endorsed the ICOMOS report '*The Future of Ours Pasts: Engaging Cultural Heritage in Climate Action*' and is committed to ensuring long term protection and conservation of cultural heritage through the good practice, adaption and mitigation advice it provides and the action it recommends.

If you have any questions regarding the above advice, please contact Veerle Norbury, Senior Heritage Assessment Officer at Heritage NSW, on 9873 8616 or via email at [veerle.norbury@environment.nsw.gov.au](mailto:veerle.norbury@environment.nsw.gov.au).

Yours sincerely



**Steven Meredith**  
Regional Manager, South  
Heritage NSW  
Department of Premier and Cabinet  
**As Delegate of the Heritage Council of NSW**  
4 March 2020