

Our ref: HMS ID 6788

Chris Eldred
Senior Planning Officer
Department of Planning, Housing and Infrastructure
christopher.eldred@planning.nsw.gov.au
Letter uploaded to the Major Projects Planning Portal

Advice on Environmental Impact Statement – State Significant Development

Proposal: Huntlee New Town – Stage 2

Major Project reference: SSD-70748466

Received: 18 July 2024

Dear Mr Eldred,

Thank you for your referral dated 18 July 2024 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) proposal.

In preparing this advice Heritage NSW has reviewed the following documents:

- Relevant sections of the *Environmental Impact Statement Huntlee New Town Stage 2, Huntlee New Town, North Rothbury*, Ethos Urban, 28 June 2024, and specifically the following appendices:
- Appendix G: *Huntlee Estate: Urban Design Strategy*, Hatch Roberts Day, December 2023
- Appendix I: *Huntlee Villages 2 & 3 Landscape Master Plan*, Michael White Landscape Architecture, 17 December 2023
- Appendix Q: *Huntlee New Town Stage Two–Historic Heritage Assessment*, Nelson Heritage Consulting, June 2024

Based on our review of the above documents, additional information is required for Heritage NSW to advise the Department on whether the environmental heritage assessment substantially complies with the Planning Secretary's Environmental Assessment Requirements (SEARs). Our review has identified key matters, as outlined in Attachment A that must be addressed in order for Heritage NSW to provide advice regarding all environmental heritage aspects of the project approval.

Based on the information currently provided, Heritage NSW has prepared preliminary recommendations which are included in Attachment B. Further recommendations may be made when the additional information (as outlined in Attachment A) is received.

Attachment B also includes recommendations for the conservation of environmental heritage at the site.

As the site contains items that have local heritage significance, and other local items are in the vicinity, advice should be sought from the relevant local council.

If you have any questions about this correspondence, please contact Anna Simanowsky, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely

Nicole Davis

Nicole Davis
Manager Assessments
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate of the Heritage Council of NSW
21 August 2024

Attachment A – Additional Information Required for Environmental Heritage on Huntlee New Town – Stage 2 (SSD-70748466)

Amend the Historic Heritage Assessment

1. The Historic Heritage Assessment (HHA) should be amended to include an assessment of the heritage impacts of the proposal on all heritage items in the vicinity of the project area. Recommendations to mitigate and/or minimise any adverse impacts should be included. The heritage impacts of the proposal on the following heritage items should be assessed:
 - a. Collieries of the South Maitland Coalfields/ Greta Coal Measures (item I215, Cessnock Local Environmental Plan 2011). This listing encompasses several separate sites. The relevant site under this listing is to the immediate west of Branxton Railway Station. A portion of the relevant I215 site is located within the project area, with the remainder being adjacent to the project area.
 - b. Branxton, Black Creek Underbridge, listed on the ARTC section 170 Heritage and Conservation Register.
2. The HHA (p. 46) notes that the continuous reworking of the former Ayrfield No. 3 (Rothbury) Colliery site has likely compromised its archaeological potential but provides limited data to support this conclusion. Further assessment of the former Ayrfield No. 3 (Rothbury) Colliery should be undertaken to demonstrate its archaeological potential, including discussion of known former colliery structures or associated features, mapping, and discussion of later disturbances.
3. The HHA should be amended to include an assessment of the potential significance of archaeological remains associated with any former colliery structures or works.
4. An assessment of archaeological potential for the Cwmdy Colliery should be included as a part of the archaeological assessment in the HHA and should include an assessment of whether potential remains would be of significance.
5. The HHA (p. 14) notes that from the mid-nineteenth century the Rothbury Estate was subdivided and leased to tenant farmers. Discussion and assessment should be included in the HHA to determine if there is archaeological potential associated with this phase.
6. The HHA's significance assessment for the project references archaeology as a part of the assessment under Criterion (e), research potential. The assessment should include further information to demonstrate the potential significance of archaeological deposits.

The significance of all potential archaeological resources should be assessed with reference to the guideline *Assessing Significance for Historical Archaeological Sites and 'Relics'* (Heritage Branch 2009). The revised assessment should include identification of whether the potential archaeological resource may contribute to the significance of the item under other criteria, and whether the potential archaeological resource would be of Local or State significance.

Prepare an Archaeological Research Design and Excavation Methodology

7. Following completion of updates to the HHA, an Archaeological Research Design and Excavation Methodology (ARDEM) should be prepared in accordance with the guideline *Archaeological Assessments* (Heritage Office and DUAP 1996) to inform and guide archaeological investigations, which includes test excavation within AAS 3, 5, and 6 at a minimum. The ARDEM should:

- a. Identify the potential archaeological resource on site, and how it will be impacted by the proposed works.
- b. Identify research questions to guide the archaeological program.
- c. Justify the proposed approach to investigation, including metal detecting in AAS 1, 2, and 4 if proposed.
- d. Propose a methodology for archaeological investigations on site, including a sampling strategy for the test excavations as appropriate.
- e. Consider the inclusion of an artefact discard policy and procedure.
- f. Include clear triggers and hold points for the identification of substantially intact (and, if present, State significant) archaeological deposits/relics. The hold points should require, and allow for, consideration of redesign to avoid impacts. Heritage NSW would appreciate an opportunity to comment on the proposed management approach decided upon by the proponent.
- g. Provide a methodology for post-excavation analysis and reporting.
- h. Include provision for an addendum to the ARDEM if open-area salvage excavation is recommended as mitigation based on the results of the testing. The Addendum should detail the proposed salvage excavations and methodology and should be developed in consultation with Heritage NSW.

The ARDEM should be prepared following updates to the archaeological assessment and assessment of significance.

Nominate an Excavation Director

8. A suitably qualified and experienced Excavation Director should be nominated for test excavations. The nominated Excavation Director is to meet the requirements of *Criteria for Assessing Excavation Directors* (Heritage Council of NSW 2019).

The ARDEM and nominated Excavation Director should be submitted to Heritage NSW for approval prior to the commencement of test excavations.

Undertake test excavations

9. Test excavation should be undertaken prior to project approval to inform the detailed design for the project. The results of the test excavations should be used to inform decision-making and identify appropriate conservation outcomes and mitigation measures commensurate with the assessed significance of the identified archaeological resource.

Heritage NSW advises that the current approach for the management of any identified State significant archaeology is preservation and conservation in situ as a preferred heritage outcome.

Attachment B—Environmental Heritage Recommendations for the conservation of heritage and the design development of the concept master plan of Huntlee New Town - Stage 2 (SSD-70748466)

1. Prepare a conservation management plan

A Conservation Management Plan (CMP) should be prepared for the former Ayrfield No. 3 (Rothbury) Colliery site and its associated structures. The CMP should be prepared in accordance with Heritage NSW guidelines. The CMP should include all structures and elements associated with the colliery, including the Mine Office, Houses 1-4 and the railway spur. The CMP should be used as a reference in developing the design of the heritage park and adjacent landscaped areas as part of the detailed design of Village 3. The CMP should include a movable heritage inventory that grades the significance of items and makes recommendations for their incorporation into the heritage park or their other management.

Reason: to ensure the heritage values of the Ayrfield No. 3 (Rothbury) Colliery site are conserved.

2. Prepare a heritage interpretation plan

A heritage interpretation plan should be prepared for the development site, in particular, the former Ayrfield No. 3 (Rothbury) Colliery site. The interpretation plan should be included with the development application for the detailed design of Village 3.

The interpretation plan should be prepared in accordance with Heritage NSW guidelines. Findings of archaeological investigations on the site should be included in the plan as relevant.

Reason: to inform the public about the significance and history of the place.

3. Amend the Huntlee Stage 2 plan to interpret the rail corridor

Please provide further information regarding the rail spur corridor including justification for not retaining and interpreting it in areas beyond the heritage park/recreational area. If adequate justification is not provided, Heritage NSW recommends that the full rail spur corridor should be retained in situ and adaptively reused as part of the Stage 2 plan layout.

Reason: to ensure that an element of High significance is retained and interpreted in the layout of Stage 2.

4. Engage a heritage specialist

A heritage specialist(s) should be engaged to:

- a. Provide heritage advice to inform the detailed design of the proposed heritage park and adjacent open landscaped areas. The heritage specialist should work collaboratively with the design team to ensure that the heritage values of the former colliery are conserved and interpreted in the developed design, including the conservation of significant elements.
- b. Provide advice and documentation as required to guide the conservation and adaptive re-use of the Mine Office and other former colliery structures that are to be retained and conserved.
- c. Provide advice on the in-situ interpretation of the rail spur corridor into the Stage 2 plan layout.

Reason: to ensure that key items of significance related to the former collieries are incorporated into the design of Stage 2 and to ensure that significant heritage items are conserved in accordance with best practice.

5. Retain the Mine Office

Please provide further information regarding the Mine Office including justification for the proposed demolition of the building. If adequate justification is not provided, Heritage NSW recommends that the Mine Office should be retained, conserved and adaptively reused.

Reason: the HAA has assessed that this building is of exceptional significance and its demolition would have a major adverse impact.

6. Protect items of environmental heritage

- a. Immediate measures should be taken to provide temporary protection to key elements of the Ayrfield No. 3 (Rothbury) Colliery site from damage. Structures of exceptional and high significance should be protected from vandalism, unauthorised entry and weather-related deterioration as applicable including the Chimney Stack, Mine Office, Electrician's Workshop, Lamp Store and Explosives-magazine.

Reason: to protect structures that are of heritage significance from damage/ destruction.

- b. No structures or elements should be demolished or removed from the Ayrfield No. 3 (Rothbury) Colliery site, including the Mine Office and Houses 1 to 4, without development approval. A separate development application should be submitted for any works proposed to be undertaken that would impact on any structures or elements related to the Ayrfield No. 3 (Rothbury) Colliery site other than for the provision of temporary protection.

Reason: to protect structures and elements that are of heritage significance from damage/ destruction.