

Our ref: HMS ID 11286

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Advice on Response to Submission – State Significant Development

Proposal: Huntlee New Town - Stage 2

Major Project reference: SSD-70748466

Received: 25 July 2025

Dear Ms Givney,

Thank you for your referral dated 25 July 2025 inviting the Heritage Council of NSW to provide advice on the above State Significant Development (SSD) Response to Submissions (RtS).

The following advice is provided to address the applicant's response to the heritage issues raised.

1. We note that the SSD site was subject to an act of arson in September 2024 which caused extensive damage to the Mine Office (exceptional significance). We request further information/analysis be provided for the Mine Office and seek advice on what measures are being taken to protect heritage items within the site from further damage – please refer to Attachment A.
2. In order to complete our assessment we request further information related to historical archaeology. We recommend that the Department of Planning, Housing and Infrastructure require the applicant to provide the information as outlined in Attachment A.
3. The updated Historic Heritage Assessment (Nelson Heritage Consulting, March 2025) (updated HHA) recommends that a Conservation Management Plan (CMP) be prepared for the former Ayrfield No. 3 (Rothbury) Colliery as part of the detailed Development Application (DA) for Village 3. This generally aligns with our previous advice but to clarify, the CMP should be prepared ahead of the detailed DA so that it can inform the detailed design. The detailed DA for Village 3 should be required to demonstrate how it has responded to and complied with the recommendations of the CMP.

We note in particular that the updated HHA grades House 1, Lamp Store, Winding Engine and Magazine as being of high significance, with the Lamp Store and Magazine noted as items that contribute to the State Heritage significance of the place. We recommend that the demolition of these items should not be approved at concept design stage before a CMP has been prepared.

4. The updated HHA recommends that a Heritage Interpretation Plan (HIP) be prepared for the Former Ayrfield No. 3 (Rothbury) Colliery as part of the detailed DA for Village 3 to inform the detailed design. Heritage NSW agrees with this recommendation but considers that the scope of the HIP should include the full area of Huntlee Stage 2 and not be limited to 'open space and recreation facilities at the Former Ayrfield'. This is to ensure that interpretation of other features of the development area, including Bentham Farm and the rail spur, can be included in the HIP.
5. We support the retention of the rail spur line though Village 3 but continue to recommend the rail spur corridor alignment also be retained through other areas of the development. We consider that its integration into the plan would enhance an understanding of the significance of the site, and its adaptive reuse as part of an active transport route would be appropriate. We note:
 - The rail spur corridor is important to the significance of the place. The updated HHA notes that the original corridor alignment remains intact and assesses that the rail spur has high significance and would form part of a complex of items suitable for State Heritage listing.
 - The Response to Submissions Report (Ethos Urban, 9 July 2025) (RtS Report) notes that the spur's rail infrastructure is degraded and has been replaced in some sections. Our recommendation is for retention and adaptive reuse of the corridor alignment spatially rather than retention of any rail infrastructure therein.
 - The RtS Report states that there are topographical constraints to retaining the rail corridor. The retention of the rail spur corridor alignment would not preclude alterations to its existing ground levels to suit the development.
 - The RtS Report states that the retention of the rail spur corridor would result in the loss of 100-200 homes and would require perimeter roads to both sides. Retention of the rail spur corridor would require changes to the proposed layout, but its not clear why it would result in a significant loss of home sites or why roads would be required at both sides of the corridor.
 - We continue to recommend that heritage expertise be sought to inform the retention and adaptive reuse of the rail spur corridor.

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,

Alison Lamond

Alison Lamond
Manager
Major Projects

Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate of the Heritage Council of NSW
18 August 2025

Attachment A - Huntlee New Town - Stage 2 (SSD-70748466)

1. Please provide an Options Analysis for the Mine Office

The updated HHA states that the Mine Office was damaged in an act of arson in September 2024. We request an options analysis be prepared for the building with consideration to its changed circumstance, noting that the updated HHA assesses the Mines Office to be of exceptional significance.

The updated HHA recommends a structural assessment of the building be undertaken. Heritage NSW agrees with this recommendation. A structural assessment should inform the options analysis.

The options analysis could include (but need not be limited to) restoration of the building, retention and management as a ruin, interpretation, salvage and reuse of significant fabric, interpretation or combinations of these options. The options analysis should consider the physical condition of the building and its exceptional significance. It should be prepared by a suitably qualified heritage expert with reference to expert structural advice.

2. Please provide advice on measures that are being taken to protect the significant heritage items from damage.

In our letter dated 21 August 2024 (HMS ID 6788) we recommended that immediate measures be taken to provide temporary protection to key elements of the Ayrfield No. 3 (Rothbury) Colliery site from damage. With consideration to the arson attack that occurred in September 2024, we recommend that the applicant advise on what measures are being taken to protect the site from further damage.

3. The updated HHA – please provide additional information and/or clarification

a. Former Ayrfield No. 3 (Rothbury) Colliery

- i. Table 5 of the updated HHA assesses the research potential of the Pit Top area of the colliery as having 'Local / Nil' significance. Please provide further information to clarify whether potential archaeological deposits, if intact and interpretable, would be of local significance.
- ii. Noting that a number of features associated with the early development of the colliery, such as the pump house foundations and explosives magazine, are considered contributory to the significance of the item, please clarify whether archaeological remains associated with the early development of the colliery would also be considered contributory or would have potential to enable further interpretation of the built phases of individual structures as a means of understanding their historical development.

b. Bentham Farm

It is noted that one area of archaeological potential identified at the EIS stage (the location of a hut recorded in 1828, initially identified as AAS 5) has been removed from the updated assessment. The rationale for this amendment is unclear, and discussion of this location appears inconsistently throughout the updated HHA, with Section 5.7 identifying it as having local significance. In relation to this hut:

- i. Noting the presence of post holes identified on the surface at the recorded location of the hut during survey, the assessment should be updated to include this area of archaeological sensitivity.
 - ii. Section 3.1 of the updated HHA includes a reference to the site likely serving as housing for convict workers on site. The assessment and identified extent of this area of archaeological sensitivity should be updated to include consideration of the potential for archaeological deposits to be present associated with this use of the site, such as ancillary structures, rubbish pits, wells, and cesspits.
 - iii. Table 8 of the updated HHA notes that the site was 'in use short term', however the basis for this statement is unclear given the lack of documentary evidence relating to the site.
 - iv. The updated HHA notes that visible remains which may be associated with the hut are not well preserved, but does not provide a clear assessment of the potential for subsurface archaeological deposits to be present at this location.
 - v. Based on the available information, it is understood that potential archaeological remains are likely to be associated with the early period of colonisation in the Lower Hunter and may be associated with occupation of the site by convicts working for Joshua Thorpe, the grantee of the land. If the archaeology is substantially present and intact, it may have potential to answer research questions regarding the early occupation of the site, colonisation of the Lower Hunter, the nature and scale of activities being undertaken on site, and the daily lives and conditions of convicts in the colony.
- c. Management and mitigation measures – historical archaeology
- i. Noting that potential archaeological deposits assessed by the updated HHA as being of local and State significance are proposed to be impacted by the project, please provide discussion of alternatives considered to minimise or avoid impacts to identified areas of archaeological sensitivity.
 - ii. Update Recommendation 1 to outline the nature and scope of the 'further investigation' proposed in relation to the area of archaeological potential associated with Bentham Farm. Based on the information available, Heritage NSW considers that archaeological test excavation is required to determine the significance and appropriate management of this site.
 - iii. Update Recommendation 7 to clarify the nature and scope of the 'thorough archaeological assessment' recommended prior to the removal of the Mine Office. Based on the information available, Heritage NSW considers that archaeological test excavation is required to determine the significance and appropriate management of this site.
 - iv. In our letter dated 21 August 2024 (HMS ID 6788) we recommended that test excavation 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. Test excavation should be undertaken by a suitably qualified and experienced Excavation Director in accordance with an Archaeological Research Design and Excavation Methodology, to be approved by Heritage NSW prior to the commencement of works as outlined in our previous response.