



File No: SF15/29490
Ref No: DOC17/480207

Matthew Sprott
Team Leader – Resource Assessments
Department of Planning & Environment
320 Pitt Street
SYDNEY NSW 2000

Sent by e-mail to: Matthew Sprott <matthew.sprott@planning.nsw.gov.au>

Dear Mr Sprott,

Response to Request for Further Information for United Wambo Open Cut Coal Mine Project, (SSD 7142 DA 305-7-2003 MOD 16 and DA 177-8-2004 MOD 3)

Reference is made to your email dated 21 September 2017 requesting comments from the Heritage Council of NSW (the Heritage Council) regarding the request for further information for the above proposal. The information reviewed as part of this response is as follows:

Report 'UNITED WAMBO OPEN CUT COAL MINE PROJECT RESPONSE TO REQUEST FOR FURTHER INFORMATION, prepared by Umwelt (Australia) Pty Ltd on behalf of United Collieries Pty Ltd, September 2017

The proposed State Significant Development (SSD) site would result in the merging of two previously discrete mining areas in a joint venture; the United Colliery and underground mine and the Wambo open cut coal mine and would convert the United mine to an open cut coal mine. The subject SSD is in the vicinity (within 3km) of State Heritage Register item; Wambo Homestead (SHR no.0200) and the prior Statement of Heritage Impact showed Wambo Homestead would not be subject to further impact as a result of the project. Prior correspondence dated 22 September 2016 agreed no additional management measures would be required for Wambo Homestead.

The Umwelt response to the request for information on heritage matters is considered below.

The Dog Leg Fence

Approximately 17 km of Dog-Leg Fence considered to be of State heritage significance of which 450 m will be removed. To mitigate this impact detailed archival recording and an interpretation strategy is proposed. Prior correspondence from the Heritage Council requested that an updated Statement of Significance for the Dog-Leg Fence be prepared as part of the Response to Submissions Report (RtS). The update was to clearly indicate the significance of the site and provide appropriate management measures based on significance.

The Umwelt response states that the proposed management measures for the Dog-Leg fence can be appropriately undertaken post approval, as impacts on the fence are not anticipated until year 11 of the proposed project. Measures would include detailed recording of the fence

within two years of approval, undertaking additional research, and development and implementation of an interpretation plan for the fence.

This is considered acceptable, but must be specified in an appropriate Condition of Approval if the project is approved by the Department. CoA should require Archival Recording within two years and development and implementation of Interpretation for the Dog-Leg Fence.

Archaeology of Former House Site

This site was assessed in the EIS to be of local heritage significance with the potential to reveal archaeological information about the local area and would be removed by mining. To mitigate this impact archaeological excavation of the site is proposed. Prior correspondence from the Heritage Council advised that the mitigation measures provided did not include sufficient detail such as an archaeological research design or method as to the size and scope of the proposed archaeological excavation. This information should be completed and forwarded to the Heritage Council for approval prior to works progressing on site

The Umwelt report advises that an archaeological methodology and research design will be prepared and submitted to the Heritage Division (sic.) for approval prior to works progressing on site (as part of the Heritage Management Plan and that United would ensure that an appropriately qualified and experienced consultant will be engaged to undertake this work.

This is considered acceptable, but must be specified in an appropriate Condition of Approval if the project is approved by the Department. CoA should require preparation of an Archaeological Research Design and Methodology to be approved by the Heritage Council of NSW or its Delegate prior to the undertaking of archaeological work at the Former House site. This has been included in a draft condition below.

Shearing Shed and Creamery

A photographic record was prepared as part of the Historic Heritage Assessment. Umwelt have stated this is considered sufficient. Prior correspondence requested that additional archival recording should be undertaken to include: recording of views to and from the site as well as drawings and plans of the site and should occur prior to their removal commensurate with their significance as a local landmark. The photographic recording as part of the current assessment should also be updated to provide a map of where the photographs were taken, in accordance with Heritage Council guidelines.

The prior Heritage Council comment has not been addressed. If the project is approved by the Department a CoA should require preparation of a full archival recording in accordance with Heritage Council guidelines. That record should be lodged with DPE, the Heritage Council and the local Council. These requirements have been included in draft conditions below.

The prior correspondence (letter dated 22 September 2016) also queried whether the local sites including the Shearing Shed and Creamery, may contain archaeological relics. The Umwelt report advises that United will commit to undertaking further investigations of the potential for relics as a mitigation measure prior to any disturbance of the site, to ensure any relevant heritage values are recorded. This has been included in draft Conditions below.

It is recommended that such action is mandated through a Condition of Approval.

Montrose Property

This property is located to the northwest of the Project Area approximately 750 metres from proposed extension to the northwest corner of the approved Wambo Open Cut. The Montrose Property has no statutory listing but was assessed as having local significance. Ongoing management of the Montrose Property is a requirement of the existing Wambo Open Cut project, and the prior letter recommended that a condition report prior to blasting should occur for this site.

The Umwelt report advises that United commits to undertaking a structural assessment of the property prior to any blasting associated with the Project. This should be required through a Condition of Approval and has been included in a draft condition below.

Recommended Conditions

In addition to the comments provided on specific sites above, the Heritage Council also recommends that if the project is approved by the Department that conditions regarding historic heritage and archaeology, as included in the previous correspondence, should be imposed. These should include matters such as:

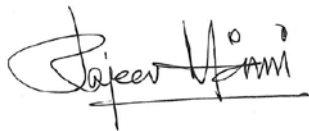
- A Historic Heritage Management Plan for the project must be prepared in accordance with the guidelines in the NSW Heritage Manual that clearly indicates all heritage items in the vicinity of, and in the project area, provides a statement of significance for each item and a list of the impact mitigation and management strategies for each item. This document must also address the project's compliance with the conditions of previous approvals, and any requirements in the Conservation Management Plans for Wambo and Springwood Homesteads. The HHMP should also consider conservation and reuse for the properties that are to be retained, to avoid leaving properties vacant and vulnerable to vandalism and ruin.
- Those documents should be prepared for the approval of the Secretary, Department of Planning & Environment upon receipt of advice from the Heritage Division of the Office of Environment & Heritage.
- Archival Recording of the full length of the Dog-Leg Fence must be undertaken within two years of the approval of the Project. Interpretation must be developed and implemented for the Dog-Leg Fence within one year of removal of any section of the fence. Interpretation must be in accordance with the Heritage Council guidelines.
- A Research Design including an Archaeological Excavation Methodology must be prepared in accordance with the Heritage Council guidelines for the areas proposed for archaeological excavation prior to commencement of works. This includes the Former House Site and the Shearing Shed and Creamery referred to above. Those documents should be prepared for the approval of the Secretary, Department of Planning & Environment upon receipt of advice from the Heritage Division of the Office of Environment & Heritage.
- An archaeological consultant shall be nominated for the works. The consultants shall have appropriate qualifications and experience commensurate with the scope of the Major Project works and should meet the requirements of the Excavation Director Criteria published by the Heritage Council of NSW. The name and experience of these consultants shall be submitted to the Secretary for approval prior to commencement of works.
- After any archaeological works have been undertaken, a copy of the final excavation report(s) shall be prepared and lodged with the Heritage Council of NSW, the local

Council and the Department of Planning & Environment. The proponent shall also be required to nominate a repository for the relics salvaged from any historical archaeological excavations.

- All heritage items potentially subject to vibration and blasting impacts must be subject to a baseline condition assessment prior to blasting as part of the project. This includes the Montrose Property. This assessment must be included in the Historic Heritage Management Plan and be updated annually when blasting occurs within 5 km of the site during any given year. This assessment
- All heritage items required to be removed in whole or part by the project must be subject to archival recording in accordance with the Heritage Council publication 'How to prepare archival records of heritage items' and should include drawings and detailed photographic recording in accordance with the Heritage Council publication 'Photographic Recording of Heritage Items Using Film or Digital Capture' (2006). The archival recording for the Shearing Shed and Creamery must also include views to and from the item due to its significance as a social landmark for the community. Archival records must also be submitted to the DPE, the Heritage Council and relevant local Council libraries.
- A historic heritage induction for the site must occur for all personnel.
- Historic heritage items within the project area that will not be impacted by the project must be appropriately fenced and information on their locations shown on project mapping.
- Any interpretation strategy prepared as part of the project must be completed in consultation with the Heritage Council of NSW.

If you have any questions regarding the above matter, please contact Dr Siobhan Lavelle OAM, Team Leader Archaeological Heritage, at the Heritage Division, Office of Environment and Heritage on telephone (02) 9873 8546 or by e-mail: siobhan.lavelle@environment.nsw.gov.au.

Yours sincerely



Rajeev Maini
Manager, Conservation
Heritage Division
Office of Environment & Heritage
As Delegate of the Heritage Council of NSW
6 October 2017