



Our ref: DOC20/347033

Stephen O'Donoghue  
Director Resource Assessments  
Department of Planning, Industry and Environment  
12 Darcy Street  
Parramatta NSW 2124

By email: Stephen.ODonoghue@planning.nsw.gov.au  
cc: Howard Reed <howard.reed121@gmail.com>

Dear Mr O'Donoghue,

**Response following proponent response to Heritage NSW RTS letter for Dendrobium Coal Mine Extension Project (SSD-8194)**

The Heritage Council of NSW commented on the proposal in letters dated 8 October 2019 (EIS) and 4 March 2020 (RTS). Following the RTS letter, the proponent, South32, contacted Heritage NSW with a request for a meeting to address issues raised in the earlier submissions. A meeting was held on 20 May 2020. Following the meeting, the proponent provided the following additional information:

- Letter to Department of Planning, Industry and Environment re: *Dendrobium Mine – Plan for the future: Coal for steelmaking (SSD 8194) – Heritage Council NSW response to submissions report*, prepared by South 32, dated 4 May 2020 ('**Letter 1**'); and
- Letter to Heritage NSW re: *Dendrobium Mine – Plan for the future: Coal for steelmaking (SSD 8194) – Heritage NSW – Supplementary Information*, prepared by South 32, dated 29 May 2020 ('**Letter 2**').

Figure 1 in Letter 1 shows that the southern section of the easternmost Area 6 longwall is proposed within the Cordeaux Dam SHR curtilage area. The proponent has argued that only a small portion of the curtilage area would be undermined by the Project and has explained that relocating this longwall is not possible due to other constraints including waterways, swamp areas, dam wall setback etc.

Figure 5 in Letter 2 shows the affected SHR curtilage which is proposed to be undermined by Longwall 605, including one house (Engineer's Cottage), four sheds, two barbeque shelters, one tank and one other structure. The Engineer's Cottage is of high heritage significance within the Cordeaux Dam listing. Figure 6 in Letter 2 shows the predicted profiles of vertical subsidence in Longwall 605 reaching up to 1800mm. Due to the location of the Engineer's Cottage on the edge of the longwall, Letter 2 (Figure 7) predicts the subsidence in this particular location to reach 100mm, and notes that this '*could result in minor serviceability impacts, such as door swings or issues with gutter and wet area drainage*'. Letter 2 notes that Property Subsidence Management Plans would be developed to manage potential subsidence impacts on the built structures, in consultation with WaterNSW as the infrastructure owner.

Heritage NSW appreciates the provided additional information. However, we reiterate our original commentary to the Department of Planning, Industry and Environment that the longwall should be relocated outside the SHR curtilage to avoid impacts caused by undermining of the built and landscape elements.

However, if DPIE approves the application, the following conditions should be imposed to attempt to reduce impact to an item listed on the State Heritage Register of NSW:

- A condition survey of the affected area prior to the commencement of the project, to report on the condition of landscape and built elements prior to any construction or excavation. This report is to record any existing damage and the state of any particular aspects that are likely to be affected by the works.
- An inspection and continuous monitoring program of the affected area during the construction and operation stages, and for two years following decommissioning and site remediation.
- Any damage to landscape and built elements due to mine construction and operation and for two years following decommissioning should be firstly prevented. Any damage must be carefully rectified immediately in accordance with conservation standards such as the Australia ICOMOS Burra Charter, best industry practice and Heritage Council of NSW guidelines.

Letter 1 clarifies that the height of ventilation shaft infrastructure during construction stage would be significantly higher (35m high) than the height of infrastructure during operation phase (fans 8m high; flares 15m high).

Letter 2 clarifies the location of the proposed ventilation shafts sites (6A and 6B) in relation to the Cordeaux Dam SHR curtilage area and the existing infrastructure. The shaft sites are proposed outside of the SHR curtilage area. Two views from the Cordeaux Dam wall are provided showing existing infrastructure (Cordeaux Pit Top and ETL Towers). The letter notes that the shaft sites are proposed further than the ETL towers and would be lower in height, and that therefore these sites may be obstructed due the topography and vegetation. Even though the shaft sites' height and distance from the Cordeaux dam wall might reduce the visual impacts, a photomontage of these sites was not provided and therefore the full visual impact is not clear.

Archaeological management was not raised by the proponent in the meeting of 20 May as an issue. However, Heritage NSW reiterates its previous advice to DPIE from the RTS response that if DPIE approves the application, the following condition should be imposed to assist guidance and management of the Nebo Colliery and Kembla Heights Mining Village:

- A conservation management plan (CMP) for the Nebo Colliery and Kembla Heights Mining Village should be prepared prior to the new works on the sites, to guide areas for change. The CMP should not be used to justify changes to the old mining infrastructure to accommodate the new mine workings.

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

Yours sincerely



**Steven Meredith**  
Regional Manager, South  
Heritage NSW, Community Engagement

Department of Premier and Cabinet  
**As Delegate of the Heritage Council of NSW**  
7 July 2020