

APPENDIX A

Ravensthorpe Homestead Complex – Glendell Continued Operations Project – Heritage Council comments on Response to Submissions Report (RTS) (Umwelt September 2020)

Heritage Council general comments 11 February 2020 on EIS.	Response to Submissions	Heritage Council review of RTS
<p>1. The Heritage Council endorsed the ICOMOS report, <i>'The Future of Our Pasts: Engaging cultural heritage in climate action'</i> in 2019 and is committed to ensuring long term protection and conservation of our cultural heritage through the good practice, adaption and mitigation advice it provides and the actions it recommends.</p>	<p>No response has been provided to the Heritage Council general comments.</p>	<p>No response is required.</p>
<p>2. The Heritage Council considers that Ravensthorpe Homestead and its surrounding cultural landscape is likely to be of state heritage significance for its aesthetic, historic, scientific and social values.</p>	<p>The revised statement of significance within the RtS is consistent with this comment.</p>	<p>The revised statement of significance is considered adequate.</p>
<p>3. The proposed relocation of Ravensthorpe Homestead will result in the irreversible loss of its identified high and exceptional significance in the form of its intact fabric, setting, views and meaning. The cultural landscape which reinforces the Complex's state significance including in-situ archaeology, Aboriginal intangible cultural values and cultural landscape plantings will be lost. The proposed relocation options also have potential to result in loss and major damage to the significant fabric of Ravensthorpe Homestead.</p>	<p>The proposal still seeks to relocate Ravensthorpe Homestead based on economic grounds to allow the proposed works to go ahead.</p>	<p>The Heritage Council considers that the proposed removal of Ravensthorpe Homestead from its original location as outlined in the EIS and RtS reports will result in the irreversible loss of its state significance in the form of its significantly intact fabric, archaeology, Aboriginal and colonial landscape setting, and views.</p>
<p>4. The Heritage Council does not support the relocation of Ravensthorpe Homestead as either option would result in an unacceptable heritage impact. The Heritage Council considers that relocating the homestead may remove its State significant values and the relocated buildings are unlikely to meet the criteria for state heritage significance.</p>	<p>The report concedes that the relocation will diminish the state significance of the Ravensthorpe Homestead.</p>	<p>The Heritage Council agrees with this conclusion.</p>
<p>5. The Heritage Council strongly supports Ravensthorpe Homestead being retained in its current, highly significant location with a curtilage around its equally significant cultural landscape.</p>	<p>The report concludes that whilst the Project will have high heritage impact on the Ravensthorpe Homestead Complex and a notable heritage impact on its core lands, the Project requires the full mining area as proposed in order to achieve a return on investment.</p>	<p>The Heritage Council does not consider this an appropriate rationale for the removal of heritage of state significance.</p>

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Heritage Council specific comments on EIS report:		
<p>1. The EIS has adequately addressed the following SEARs for the Project:</p> <p>a) <i>identification of historic heritage in the vicinity of the development and an assessment of the likelihood and significance of impacts on heritage items, having regard to the relevant policies and guidelines listed in Attachment 1;</i></p> <ul style="list-style-type: none"> • This part of the SEAR has been adequately addressed in the EIS. <p>b) <i>in relation to Ravensworth Homestead, the EIS must include a detailed historical archaeological assessment of the homestead, including consideration of its surrounding garden and landscape.</i></p> <ul style="list-style-type: none"> • This part of the SEARs has been adequately addressed in the EIS. Enough historical archaeological testing was completed to establish that the Ravensworth Homestead and property retains a historical archaeological resource of State significance. If the Homestead is retained as part of an amended Glendell proposal, then the archaeology would also be retained <i>in-situ</i> and undisturbed. It is considered that this part of the SEAR relating to historical archaeology has been met. • If the extension of the Glendell Pit is approved in its current form, then full archaeological salvage would be required as a mitigation measure as recommended by Casey & Lowe in their November 2019 report. <p>c) <i>...how the Ravensworth Homestead Advisory Committee was involved in the decision [for relocation of Ravensworth Homestead].</i></p>	<p>Satisfied</p>	<p>No comment required.</p>

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<p>2. The EIS has <u>not adequately addressed</u> the following SEARs for the Project. It is requested that the EIS is updated with further information based on the following dot points:</p> <p><i>d) an assessment of the potential impacts of the development on Aboriginal heritage (cultural and archaeological), including consultation with relevant Aboriginal communities/parties and documentation of the views of these stakeholders regarding the likely impact of the development on their cultural heritage;</i></p>	<p>RTS Page 11</p> <p>Following the preparation of RTS Part A, a Plains Clan of the Wonnarua People (PCWP) Cultural Values Report containing their cultural values relating to the Project area was received on 25 June 2020. The report notes that although PCWP are not currently a Native Title Claimant under the <i>Native Title Act 1993</i> (Cth), the PCWP Values Report describes the strong connection of the member to the lands of the Upper Hunter Valley. In addition, PCWP commissioned an anthropological report prepared by Associate Professor Neale Draper. The PCWP Cultural Values report is provided as an appendix of the revised ACHAR (Appendix 3).</p> <p>The Draper report states that the Ravensworth estate and homestead has very high cultural/social, historical, scientific and aesthetic significance to the Wonnarua people and that the disturbance through the expansion of open-cut coal mining would be ‘both traumatic and culturally dangerous’ (p56, Draper, 2020). They consider that the only effective mitigation of this harm would be ‘to preserve this remaining landscape and built infrastructure on the Ravensworth estate from destruction and dislocation from open-cut mining’ (p56, Draper, 2020).</p> <p>The heritage advisor appointed to compile the ACHAR for the Project, Dr Shaun Canning (ACHM), has reviewed the PCWP Values Report and has included a summary overview of the contents which is included as Section 6 of the Revised ACHAR for the Project (provided as Appendix 3) (p12). Canning concedes that the ‘wider region surrounding the Project Area is an area that holds high cultural value(s) for the Wonnarua people’ however he disputes that there is little specific connection. This opinion is criticised by Draper (August 2020), in particular Section 7 Avoidance of Harm, stating the report, ‘effectively dismisses the PCWP cultural values assessment (Draper 2020). T</p>	<p>The RTS concludes that the outcomes of the assessment of cultural values and significance has not changed following inclusion of the PCWP Cultural Values Report as part of the ACHA (p12).</p> <p>The HC recognises the conflicting expert reports and does not agree with the Project ACHAR’s assessment of significance in relation to Aboriginal values.</p>
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	<p>Section 4 of the ACHAR states there are 91 archaeological sites located within the Proposed Additional Disturbance Footprint that will be impacted by the Project (p23, Canning).</p> <p>The revised ACHAR states that the project 'will also result in indirect impacts to Aboriginal cultural heritage values within the Project Area and the wider region and would also add to the cumulative loss of cultural heritage in the Hunter Valley (p 65, Canning).</p>	
<ul style="list-style-type: none"> The EIS has identified that the site has a very significant pre and post contact Aboriginal history. This history will be included in the SHR nomination assessment. 	<p>RTS Page 12 Contrary to the comment by the Heritage Council, included in their submission, while the historical record does record Ravensworth Estate in the contact phase of British settlement in the Hunter Valley, the role of the Estate is not highly significant or different to what was happening elsewhere in the district.</p> <p>In relation to post-contact Aboriginal history, Ravensworth Estate was the site of encounters between the British settlers, convicts and local Aboriginal people in the second half of the 1820s. However, the report concludes that the encounters that occurred across the Ravensworth Estate were not unique.</p>	<p>The Heritage Council disagrees with these statements.</p>
<ul style="list-style-type: none"> The Heritage Council notes that the EIS outlines that Aboriginal significance of the site is assessed as low-moderate based on an assessment of the scientific significance of the Aboriginal archaeology present within the Homestead area and wider estate lands. However, an interrogation of the relationship between the Homestead and Aboriginal people has not been fully investigated. <p>The EIS focuses on specific events and their locations rather than undertaking an assessment of the wider Aboriginal cultural heritage significance related to the sites social and intangible values as the place of contact between and the reason for conflict among Aboriginal groups and European early settlers.</p>	<p>RTS Page 17 Additional research has been undertaken by Dr Mark Dunn to address the Heritage Council's request that further investigations be undertaken to examine the role the Ravensworth Homestead and its wider cultural landscape played in frontier conflicts (Appendix 3).</p> <p>Dunn confirms that the Ravensworth Estate was not the only estate to be targeted by Aboriginal warriors (p18).</p>	<p>Following the completion of this additional historical research the outcomes of the assessment of Aboriginal cultural values and significance has not changed.</p> <p>The Heritage Council does not concur with this assessment and considers that the sites social and intangible values as the place of contact between and the reason for conflict among Aboriginal groups and European early settlers have not been adequately considered.</p>

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<ul style="list-style-type: none"> The impacts on these potentially significant values from the proposal have not been assessed. 	<p>RTS Page 18</p> <p>Whilst it is acknowledged that the conflicts that occurred at Ravensthorpe Estate, and elsewhere in that vicinity, were both tragic, and of high significance to local Aboriginal population, the research clearly shows that the conflicts around Ravensthorpe were no more significant than those that occurred elsewhere across the Hunter valley, or across the state. Other conflicts recorded on the Hawkesbury, at Bathurst and further west were similarly of high significance to the local Aboriginal communities that were directly affected. However, from the perspective of identifying the level of significance of Ravensthorpe Homestead, these events are not unique or confined to the Ravensthorpe Estate and therefore do not greatly elevate the historical significance of the Ravensthorpe Homestead in terms of rarity.</p>	<p>Following the completion of this additional historical research the outcomes of the assessment of Aboriginal cultural values and significance has not changed.</p> <p>The Heritage Council does not concur with this assessment and considers that the sites social and intangible values as the place of contact between and the reason for conflict among Aboriginal groups and European early settlers have not been adequately considered.</p>
<ul style="list-style-type: none"> The Heritage Council requests that the EIS should be amended to include this information. The Heritage Council considers that when the intangible values related to the role Ravensthorpe Homestead and its wider cultural landscape played in frontier conflicts are re-examined, the level of significance for the Aboriginal values of the site would be likely to increase. The impact the proposal would have on those values may then be weighted more heavily. 	<p>RTS Page 19</p> <p>The additional research and analysis completed regarding early contact history and inclusion of the PCWP Cultural Values Report has not changed the Project ACHAR's assessment of significance in relation to Aboriginal values.</p> <p>Additional research has been undertaken, as identified above, to inform this specific response including:</p> <ul style="list-style-type: none"> Revised ACHAR (Appendix 3) Dr Mark Dunn's research on frontier conflicts across the Hunter (Appendix F of Appendix 3) The Statement of Significance and comparative analysis has been amended to include summaries of and reference to the above appendices. It is provided as Appendix 2 to this RTS Part B. 	<p>The Heritage Council does not agree with the Project ACHAR's assessment of significance in relation to Aboriginal values.</p>
<p>e) <i>in relation to Ravensthorpe Homestead, the EIS must include: a detailed heritage significance assessment of the homestead, including consideration of its surrounding garden) and landscape.</i></p> <p>The assessment of the heritage significance of the homestead including its surrounding garden and landscape and subsequent Statement of Significance in</p>	<p>RTS Page 19</p> <p>LSJ has prepared an expanded analysis of the Ravensthorpe Homestead Complex to address the issues identified under item 2(e) of the Heritage Council's submission and includes a revised Statement of Significance.</p>	<p>Accepted.</p>

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<p>the EIS is considered inadequate for the following reasons:</p>		
<ul style="list-style-type: none"> The description of Ravensthorpe's connection to 'range of significant places and people' is considered inadequate. These places and people should be identified. 	<p>RTS Page 20 A list of the significant places and people associated with the Ravensthorpe Homestead is provided refer Appendix 2</p>	<p>Accepted.</p>
<ul style="list-style-type: none"> The acknowledged connection of John Verge, one of Australia's pre-eminent colonial architects, with the design of the Ravensthorpe Homestead and Stables, referred to in both this report (HHAA, p59) and in previous studies by the authors, has not been sufficiently considered. The analysis should include a precautionary approach including a comparison of Ravensthorpe with other examples of work by Verge. Furthermore, the link to Verge and the MacArthur's should be referenced in the Statement of Significance. 	<p>RTS Page 22 LSJ concludes that Verge or others may have influenced the design of the Main House of the Ravensthorpe Homestead Complex and this is possible given his connections with both Bowman and MacArthur, although no definitive documentary evidence has, at this stage, been found to substantiate the suggestion.</p> <p>The SoS has been revised in Appendix 2 to include the following text : <i>'The group of buildings comprising the complex and including the adjacent privy are of aesthetic significance on a State level for their fine dressed stonework and finely made roof carpentry, simple architectural detailing and high-quality detailed design and execution; the group was likely designed, possibly informally, by an architect or gentlemen architect of the 1820s and 1830s and, although unproven, it is possible that Henry Kitchen, John Verge or Robert Scott influenced the design of the homestead complex'.</i></p>	<p>Accepted.</p>
<ul style="list-style-type: none"> The EIS has a lack of definition of the curtilage or setting of Ravensthorpe Homestead and lacks an assessment of the cumulative impact of the works on the significance of the Core Estate Lands. 	<p>RTS Page 23 LSJ have completed an expanded analysis of the Ravensthorpe Homestead in relation to the curtilage and setting of the place which is provided in detail in Section 2.3.1 of Appendix 2</p> <p>As provided in Section 2.3.2 of Appendix 2, LSJ conclude that based on the analysis, it can be said that the proposal will have a high or substantial cumulative impact on the significance of the Core Estate Lands as a whole.</p>	<p>Agreed that the proposed works will have a substantial cumulative impact on the significance of the Core Estate Lands and Ravensthorpe Homestead.</p>

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	<p>Table 4.2 (p31) also provides an assessment of significance against the extension of open cut mining operations. The assessment finds that the works will have a notable heritage impact on the 'the place' and the core area of the estate and aboriginal archaeology; and a high heritage impact on the Ravensthorpe Homestead Complex including some aspects of exceptional significance (p31).</p> <p>LSJ have stated that mitigation of loss of heritage significance will vary dependent on the option selected. Option 1 (relocation to Ravensthorpe Farm) is preferred by LSJ as compared to Option 2 (relocation to Broke Village) which, in their opinion, provides less avenue for mitigation.</p> <p>The proposed mitigation measures include full salvage archaeology and relocation of the RHC to a new setting which is like the existing if relocated to Ravensthorpe Farm and not Broke. The works will also have a high heritage impact on the social significance of the Ravensthorpe Estate. The proposed mitigation is the relocation of the RHC, Yorks Creek and Hebden Road and retention of names.</p> <p>Table 4.3 provides a ranking of significance before and after relocation/rebuilding that indicates both options will diminish state significance of Ravensthorpe Homestead Complex Group and that the Broke option retains no state significance.</p>	
<p>The comparative analysis with pre 1850s Hunter homesteads is inadequate to enable an assessment of the significance of Ravensthorpe as the following have not been considered:</p> <ul style="list-style-type: none"> • The main house on the Ravensthorpe property (called Ravensthorpe) has been identified as one of very few homesteads from the initial establishment period to survive relatively unchanged in terms of its vernacular form (CHS, p57). 	<p>RTS Page 35</p> <p>The RTS acknowledges that the 'H' plan form of the bungalow with porch <i>in antis</i> to both the front and rear elevations distinguishes Ravensthorpe from all of its contemporaries in the Hunter Region, making Ravensthorpe a very rare example of the colonial bungalow house type, with only two other extant examples of this house form known to survive in NSW (Horsley Park and Glenlee).</p>	<p>Agreed.</p>

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	<p>As a result of further analysis completed by LSJ as presented in Section 2.4.1 of Appendix 2, LSJ have revised the Statement of Significance (LSJ, 2020) to state: <i>‘The intactness of the Main House of Ravensthorpe makes the place relatively rare within the context of the Hunter Region and of high significance, however the original “H plan” form of the Main House of Ravensthorpe makes the place extremely rare and of exceptional significance on a State level’.</i></p>	
<ul style="list-style-type: none"> There are 4 properties identified in the 2013 comparative study which also include a House and Primary Farmyard with five or more buildings with a single nucleus, including Bolwarra (modified by later additions), Negoa, Kinross and Abbey Green. Existing SHR items with similar features include Tocal Homestead (SHR00147) and Dunmore House (SHR01887). Direct comparisons between Ravensthorpe and these properties have not been made. 	<p>RTS Page 41 Ravensthorpe is distinct from the above selection of Hunter Estates for retaining five relatively intact colonial farm buildings, all constructed in c1832 with complementary architectural detailing and in the same material, configured as a symmetrical, designed group of buildings, forming an enclosed farmyard (p41).</p> <p>Ravensthorpe is distinct in this respect, as unlike the majority of Hunter Estates, which were added to, altered and reconfigured over time, particularly during the Victorian era, Ravensthorpe has retained the majority of its original principal buildings relatively intact and continues to present as a c.1832 homestead complex (p42).</p> <p>Based on further analysis, the Statement of Significance (SoS) has been amended to include the following: <i>The configuration, construction date, intactness and design attributes of the Ravensthorpe homestead complex makes the place very rare in the context of the Hunter Region and is of State level significance.</i></p>	<p>Agreed.</p>
<ul style="list-style-type: none"> the use of architects in the design and construction of the early homesteads is rare. It appears that Ravensthorpe is a rare example of this. 	<p>RTS Page 42 The comment has been agreed with by LSJ and Dr James Broadbent.</p> <p>As a result of further analysis completed by LSJ as presented in Section 2.4.1 of Appendix 2, LSJ have revised the Statement of Significance to state:</p>	<p>Agreed.</p>

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	<p><i>The Ravensthorpe Homestead Complex is relatively rare in the context of the Hunter Region for most probably being an example of an early homestead designed by an architect or gentlemen architect (p43).</i></p>	
<ul style="list-style-type: none"> the known archaeology and written records existing for Ravensthorpe relating to its Aboriginal history is an uncommon and highly significant aspect of the place, particularly regarding its history as a place associated with frontier conflict between European and Aboriginal people. 	<p>Following the completion of this additional historical research the outcomes of the assessment of Aboriginal cultural values and significance has not changed.</p> <p>RTS Page 44 Combining the historical disconnection of people from place with the extensive landscape modification since settlement means that the Project Area has a relatively low cultural significance when compared to other places within the wider region. This is also consistent with the archaeological assessment, which has determined that most of the pre-contact archaeological sites are of low to moderate scientific significance due to the levels of post-depositional disturbance that has occurred in the region.</p> <p>While there was some interesting contact period archaeology discovered and recorded by OzArk in the region (2019), the likelihood of significant Aboriginal archaeological sites remaining undiscovered in the area of Ravensthorpe is low.</p>	<p>Disagree</p>
<ul style="list-style-type: none"> Although incidents of violent conflict between European and Aboriginal peoples are likely to have been more common, only approximately 16 of these incidents in the 1820s are well documented. Six of these incidents are associated with the Ravensthorpe property, including one incident popularly referred to as the Ravensthorpe Massacre. Other incidents are noted to have occurred in the vicinities of Gostwyck, Invermein and Segenhoe, and existing SHR item, Merton (SHR00159). The site with the most available documentation, and therefore the closest comparative example in this sense, is Gostwyck. Direct comparisons with these properties have not been made. 	<p>Following the completion of this additional historical research the outcomes of the assessment of Aboriginal cultural values and significance has not changed.</p> <p>RTS Page 44 Taken in the wider context of the ongoing conflict, while Ravensthorpe was targeted, it was only one of a number of sites rather than the central focus of conflict with the events having taken place within and around Ravensthorpe Estate not being unique or uncommon. A timeline of early conflict events that occurred throughout the middle Hunter Valley between 1824 and 1827 and the spatial plotting of these events is provided as Figure 4.3.</p>	<p>Disagree. A comparative analysis of incidents noted to have occurred in the vicinities of all properties as listed and the existing SHR item has not been undertaken.</p>

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	Dr Mark Dunn prepared a report for the EIS (Appendix 22 of the EIS), <i>Ravensthorpe Contact History</i> , which has since been updated following further research and investigation and is appended to the updated ACHAR provided in Appendix 3 .	
<ul style="list-style-type: none"> The post contact history of interaction with Aboriginal people is also seen in documentation of places of Aboriginal employment such as Merton (SHR00159) and Caergwle, camp sites such as Invermein, Bolwarra and Glendon, corroboree and/or ceremonial sites such as Segenhoe and Bolwarra, and sites selected with the help of Aboriginal guides such as Bolwarra, Glendon and Segenhoe. Direct comparisons between Ravensthorpe and these properties have not been made. 	<p>Following the completion of this additional historical research the outcomes of the assessment of Aboriginal cultural values and significance has not changed.</p> <p>RTS Page 45 Further, the Ravensthorpe Estate and Project Area are not associated with any known or verified Aboriginal ceremony or tradition. ACHM state that there is 'scant evidence of any continuing traditional practices or observances of ritual or ceremony within the Project Area (refer to Section 6.11 of Appendix 3).</p>	The HC disagrees that the further research into these relationships would benefit the assessment. A comparative analysis between the places of Aboriginal employment on these properties and Ravensthorpe has not been undertaken.
<p>The Casey & Lowe report completed quite extensive assessment against the NSW Heritage Criteria, which is missing from the Statement of significance and should be included as the site is likely to provide unique insights into:</p> <ul style="list-style-type: none"> A newly established frontier and contact/ interaction with Aboriginal people. Rural lifeways, including tastes and customs through the 19th to early 20th centuries. Material culture and lives of significant colonial people. Convict lives and the assignment system and how it was implemented within this landscape. Use of technology and management of water, changing transportation and economics and how they shaped life on the estate. 	<p>The Statement of Significance in Appendix 2 has been revised to state: <i>'The Ravensthorpe Homestead Complex is important as an archaeological landscape containing an 1820s colonial house and associated outbuildings which were modified throughout the 19th and 20th centuries, and the archaeology of the estate. The homestead buildings, the remnant 19th-century farm and garden layout built by assigned convicts all provide evidence of this landscape and its history. This can testify to the way in which this early occupation by Surgeon James Bowman with expansion of the wool industry into the Upper Hunter Valley, aided by assigned convicts, irrevocably changed the lives of Aboriginal people and modified the landscape of the Hunter Valley.</i></p>	Noted.
<p>f) <i>an analysis of all reasonable and feasible options to preserve the Homestead (including leaving in situ);</i></p> <ul style="list-style-type: none"> The EIS has not adequately met the requirements of this SEAR as it has not provided an analysis of all reasonable and feasible options to preserve the 	<p>RTS Page 47 No additional information provided. The options of mining to a distance of 900m (southern boundary of Core Estate Lands) and 500m (acceptable blasting vibration on the building and removal of</p>	The HC disagrees with the premise that all alternatives to the entire site being utilised, that were not considered financially viable, should be discarded.

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<p>Homestead (including leaving in situ) or an adequate justification of why Options 6, 7 and 8 are not possible to ensure that Ravensworth Homestead is not impacted by the proposed works.</p>	<p>potential flyrock damage) to the south of the Ravensworth Homestead was not considered commercially viable for Glencore.</p> <p>The analysis concludes that the Project requires the development of the full mining area as proposed, in order to achieve a return on investment. If approval was given for an alternative mining footprint that leaves the Ravensworth Homestead in situ, then it is highly unlikely that Glencore would proceed with the Project which would have significant local, regional and State economic impacts.</p> <p>Glencore believes that the proposed mining footprint and associated relocation of Ravensworth Homestead provides an appropriate balance between the competing interests of mining and economic benefits to NSW, and the conservation of heritage values (p48).</p>	
<p>g) <i>if relocation is selected as the preferred option, please include an analysis of all feasible relocation options...</i></p> <ul style="list-style-type: none"> This SEAR has not been met. The proposed options for relocation are not considered to have been appropriately met as neither option provides for the full relocation of the entirety of Ravensworth Homestead without demolition or removal of significant fabric such as the 1920s addition and the original homestead footings. Much more detailed information needs to be provided before either option can be considered. 	<p>Glencore disagrees with the statement that this SEAR has not been met.</p> <p>RTS Page 48 Glencore have undertaken extensive research and investigation to select two reasonable and feasible options are proposed as part of the EIS.</p> <ul style="list-style-type: none"> Ravensworth Farm (Option 1) – involves the intact relocation of all buildings including moving selected trees and plants to the ‘Ravensworth Farm’ site located within the Project Area and on the original Bowman “10,000 acre” land grant (Ravensworth Estate Lands). Broke Village (Option 2) – this is a proposal put forward to Glencore by members of the Broke-Fordwich community and involves the dismantling all of the Homestead buildings and relocation to Broke where the buildings would be rebuilt and have multi-purpose usage forming the village square. 	<p>HC disagrees. Neither option provides for the full relocation of the entirety of Ravensworth Homestead without demolition or removal of significant fabric such as the 1920s addition and the original homestead footings.</p> <p>Each option is considered inappropriate as they will result in the diminishing or loss of most Ravensworth the State significant values.</p>
<ul style="list-style-type: none"> There are several significant issues raised regarding the ‘intact’ relocation Option 1, including the unique project risks outlined by the movers, as well as the 	<p>Glencore disagrees with the statement that this SEAR has not been met. Glencore disagree with the statement</p>	<p>No change from initial proposal. HC disagrees with the statement in regards to the certainty of the intact relocation option and</p>

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<p>outstanding methodology and cost calculations that provide little certainty to this option.</p>	<p>that the methodology and cost calculations provide little certainty to the option of intact relocation.</p> <p>To further supplement the information included in the Project EIS, the following additional information has been prepared by the specialist moving engineer:</p> <ul style="list-style-type: none"> • List of key potential risks and proposed mitigation measures for managing the risks associated with the intact relocation of the buildings to the Ravensworth Farm site (Option 1) (Appendix 7). • Addendum to Relocation Methodology Document - Risk Mitigation Strategies and Supporting Information (Appendix 4). This document is supplementary to the move methodology provided in Appendix 23g of the EIS and is provided as commercial in confidence as it contains sensitive intellectual property that the specialist moving engineer would like to protect. The document provides further discussion on: <ul style="list-style-type: none"> • pre-move stabilisation works • the process for removing flagstones • the presence of bedrock and its influence on the building outline, which is the location at which the building is separated from its foundation • proposed methodologies for managing the double leaf stone walls with rubble infill • the methodology for raising, lowering and supporting the buildings, and • transport requirements. 	<p>considers the level of information provided in regards to cost calculations is inadequate to demonstrate that either options are feasible.</p>
<ul style="list-style-type: none"> • Furthermore, the preferred intact relocation option will require a large amount of demolition of significant fabric which will not be relocated to the new location and the introduction of new fabric such as new footings. 	<p>RTS Page 56</p> <p>The proposed demolition of the later addition to the Main House has been supported by Dr James Broadbent, an expert in colonial architecture (Refer Appendix A of Appendix 2).</p> <p>Other disruption of heritage fabric, separate to the 20th century addition, that is required to complete the intact relocation of the buildings to Ravensworth Farm (Option 1) is restricted to the following areas:</p> <ul style="list-style-type: none"> • Dismantle and rebuild of the southern room of the Stables where walls currently require propping to 	<p>No change from initial proposal. Heritage Council disagrees with these conclusions and considers the loss of significance related to both options as catastrophic.</p>

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	<p>prevent any further separation</p> <ul style="list-style-type: none"> • Removal of hazardous materials including asbestos and lead paint and disposal at a licenced waste receival facility • Replacement of pest and weather affected timber • Disconnection of the building mid-footing with the remaining in-situ footing to be archaeologically recorded 	
<ul style="list-style-type: none"> • The current condition of Ravensworth House and its original construction techniques also mean the buildings are not favourable to relocation. 	<p>RTS Page 59 Table 4.5 provides a summary of similar intact move projects in Australia and US undertaken by Mammoth Movers.</p>	<p>HC considers that the additional information is inadequate and does not address this issue. Ravensworth is an individual building with its own specific issues and needs. A generic response is not appropriate. The comparative intact moves are all over a much shorter distance and include only a single building (no details of level changes for majority provided). The only Australian example (Hornsby) was along a level site. No details of the proposed purpose-built road with multiple level changes have been provided.</p>
<ul style="list-style-type: none"> • Insufficient information has been provided for Option 1 regarding the presence of underground mining under the recipient site and the likely blasting vibrations impacts on the relocated structures from existing adjacent mines. 	<p>RTS Page 61 Following review of subsidence impact assessment and design information for the homestead provided post EIS, Subsidence Advisory NSW has subsequently provided approval conditional on adoption of recommended subsidence mitigation strategies as a precautionary approach, which includes:</p> <ul style="list-style-type: none"> • Development of a subsidence management plan • Development and implementation of a monitoring plan across the existing site pre-relocation to identify long term trends • Monitoring of the structure post-relocation • Slab and foundation design to consider potential settlement mechanisms <p>The vibration limits are expected to increase for the relocated Homestead due to significant improvements to building foundations completed as part of the relocation. Until new vibration limits have been confirmed, the current Mount Owen Consent criteria will continue to apply to the Homestead.</p>	<p>HC considers that there is uncertainty in the assessment of impacts from vibration limits from adjacent Mount Owen mine, that are in the vicinity of Ravensworth Farm.</p>
<ul style="list-style-type: none"> • Similar issues exist for Option 2. The proposed removal of internal walls will remove original fabric, graded high 	<p>RTS Page 63</p>	<p>The HC considers that there is inadequate</p>

APPENDIX A

**Ravensthorpe Homestead Complex – Glendell Continued Operations Project – Heritage Council comments on Response to Submissions Report (RTS)
(Umwelt September 2020)**

<p>significance and alter the internal layout, graded exceptional significance. The current Option 2 proposed approach to the conservation of Ravensthorpe Homestead including the similar approach to the outbuildings will have a severely detrimental impact to their heritage significance.</p> <ul style="list-style-type: none">• The Heritage Council considers that the EIS needs much more detailed information regarding the issues raised in the above letter under point 2 (d-g).	<p>Option 2 relocation to Broke Village will require the dismantling and rebuilding of the homestead buildings to form the Broke Village square. The preliminary architectural concept involves internal modification of the buildings to provide a more usable floorplan to suit the intended end use (p63). The proposed move methodology and budget costs for Option 2 have been developed by a specialist heritage contractor with experience in the dismantle and rebuild of heritage buildings(p63). Additional supporting information regarding the identification and treatment of risks associated with the dismantling and rebuilding of the buildings for Option 2 is provided in Appendix 8.</p>	<p>cost calculations provided for Option 2 for the dismantle and rebuild of the homestead complex. A scope of works is considered insufficient.</p>
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