



Our ref: DOC20/903023

Mr Joe Fittell
Senior Environmental Assessment Officer
Department of Planning, Industry and Environment

By email: Joe.Fittell@planning.nsw.gov.au

Dear Mr Fittell

Response to Submissions of application for Glendell Continued Operations Project (SSD-9349) (Singleton Shire)

Thank you for your referral dated 2 November 2020 inviting comments from the Heritage Council of NSW on the Response to Submissions (RtS) provided by the applicant for the above State Significant Development (SSD-9349) proposal.

The Heritage Council has a policy of working with development proponents to see if there is a way of achieving acceptable economic outcomes through development while also maintaining or indeed enhancing the heritage values of the property under consideration. Early in the process for exploring expansion of the Glendell Continued Operations Project the Chair of the Heritage Council met with senior executives of Glencore and of DPIE for preliminary discussions about how the objectives of Glencore and of the Heritage Council could be met in this project. The Heritage Council believes that a balance of economic and heritage outcomes could be achieved with the Ravensworth Homestead remaining in situ.

The Heritage Council is also aware that the Aboriginal pre and post contact history of the Ravensworth Homestead is contested. Nevertheless, following recent incidents in other States involving mining and Aboriginal cultural heritage, the Heritage Council believes that a precautionary principle should be adopted around areas of contested Aboriginal history and heritage. On 11 February 2020, the Heritage Council Approvals Committee provided comments and advice on the Environmental Impact Statement (EIS) for the project. Following this response the Department of Planning, Industry and Environment facilitated a teleconference between Heritage Council members, Glencore, LSJ and Umwelt on 16 April 2020 which provided further understanding of the issues raised and the additional detail required by the Heritage Council as part of this RtS Report.

It is noted that this RtS report contains new information in answer to those comments which has resulted in an updated Statement of Significance for Ravensworth Homestead.

A detailed response to the information outlined within the RtS is contained within the attachment to this letter, however, it is reiterated that the Heritage Council considers that Ravensworth Homestead and its surrounding cultural landscape, located within the proposed open cut mining area, to be of state heritage significance for its aesthetic, historic, scientific and social values.

The Heritage Council considers that the proposed removal of Ravensworth 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.

The Heritage Council does not support the relocation of Ravensworth Homestead or the rationale provided in the EIS or RTS as either relocation option would also result in an unacceptable heritage impact as the loss of the intact homestead complex will remove its State significant values and the relocated buildings are unlikely to meet the criteria for state heritage significance.

The Heritage Council notes that the proposal conflicts with the revised Statement of Significance in the RtS: *'The intactness of the Main House of Ravensworth 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 Ravensworth makes the place extremely rare and of exceptional significance on a State level'*.

It is noted that while both options propose to re-instate the original "H plan" form of the Main House (p36), neither option provides for the full relocation of the entirety of Ravensworth Homestead. It is further noted that the RtS finds that the proposed 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 Ravensworth Homestead Complex including some aspects of exceptional significance (p31).

In conclusion, the Heritage Council strongly supports Ravensworth Homestead being retained in its current (original), highly significant location with a curtilage around its equally significant cultural landscape and does not agree with the rationale contained within the RtS that would allow for its removal and loss of significance. The Heritage Council reiterates that a precautionary principle should be adopted with respect to potential loss of Aboriginal cultural heritage.

If you have any questions regarding this advice on the RtS for the Glendell Continued Operations Project, please contact Senior Heritage Assessment Officer Tempe Beaven on (02) 9873 8629 or via email at Tempe.Beaven@environment.nsw.gov.au.

Yours sincerely



Cheryl Brown
Manager, Northern Region
Heritage NSW
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
9 December 2020

Encl: Heritage Council response to Response to Submissions Report for Glendell Continued Operations Project.