



Our ref: DOC20/695489  
Senders ref: SSD- 9349

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

Email: [joe.fittell@planning.nsw.gov.au](mailto:joe.fittell@planning.nsw.gov.au)

Dear Mr Fittell,

RE: Glencore, Glendell Continued Operations Project (SSD-9349)

Thank you for your referral dated 25 August 2020 inviting comments from Heritage NSW (HNSW) in relation to the proposed State Significant Development (SSD) at Glencore's Glendell Continued Operations Project SSD-9349 (GCOP SSD-9349) in the Singleton Local Government Area (LGA).

HNSW has reviewed the Aboriginal heritage information response to submissions documents and additional information supplied, including:

- *Glendell Continued Operations Project Response to Submissions Part B* report prepared by Umwelt, dated 2 September 2020 (redacted version); and
- *Glendell Continued Operations Project Aboriginal Cultural Heritage Report* (ACHAR) associated updates prepared by ACHM 2 September 2020;
- *Glendell Aboriginal Cultural Values Assessment Report* prepared by Tocomwall Pty Ltd on behalf of the Plains Clans of the Wonnarua People (PCWP) dated 25 June 2020;
- *Glencore Glendell Continued Operations Coal Project, Aboriginal Cultural Heritage Assessment Anthropology Report on PCWP Cultural Values* prepared by Associate Professor Neale Draper dated 12 June 2020 and appended to the PCWP report;
- *Ravensthorpe Contact History* prepared by Dr Mark Dunn Historian dated August 2019; and
- Correspondence from Dr Maria Cotter of Armidale dated 14 February 2020 providing additional commentary.

HNSW provides its comments and recommendations at Attachment A. If you have any questions, please contact Gillian Goode, Archaeologist at Heritage NSW, on 49273114 or [gillian.goode@environment.nsw.gov.au](mailto:gillian.goode@environment.nsw.gov.au).

Yours sincerely

**Dr Samantha Higgs**  
**Senior Team Leader**  
**Aboriginal Heritage Regulation Branch - North**  
**Heritage NSW**

30 October 2020  
Enclosure: Attachment A

## **Attachment A – HNSW comments and recommendations on Response to Submission and Review of Aboriginal Cultural Values for the GCOP SSD-9349**

Previous comments by HNSW (then BCD) were provided in February 2020. BCD noted that consultation with one registered Aboriginal party (RAP) was ongoing and should conclude prior to the preparation of the response to submissions report. The *Glendell Continued Operations Project Response to Submissions Part B* report, prepared by Umwelt dated 2 September 2020 (redacted version), addresses issues in relation to specific heritage issues raised in agency, community and interest group submissions.

HNSW notes that while there is historical evidence of conflict between the Wonnarua and the European settlers on several local properties along the Hunter River, Bowmans Creek and Fal Brook (Glennies Creek) inside and outside of the GCOP SSD-9349 project area (ACHM 2020, Draper 2020, Dunn 2019 and PCWP 2020), there is no material evidence to show that the current Ravensworth Homestead itself, which was built in 1832, was specifically the site of such conflict (Dunn 2019).

The ACHAR notes the location of the Upper Hunter Valley Massacre Site (AHIMS 37-3-0390), is outside of the GCOP SSD-9349 Project Area. Based on their research over the past 15 years, Umwelt concluded that registered site AHIMS 37-3-0390 cannot have been within the area now defined as the Ravensworth Estate (Umwelt 2004 and 2013, in ACHM 2020) nor within the GCOP SSD-9349 Project Area (ACHM 2020). There have been numerous archaeological surveys, surface salvage and excavations conducted across the GCOP SSD-9349 Project Area and surrounding area including test excavation within the Ravensworth Homestead precinct and Ravensworth Estate. No burials or human remains have been recorded within the GCOP SSD-9349 Project Area nor at the Ravensworth Estate or the Ravensworth Homestead area.

However, HNSW further notes that the RAPs consider the local area around Ravensworth, as well as the broader regional area, to be of high cultural significance. Many of the values expressed by RAPs included a sense of loss and longing, expressions of 'connectedness' and 'belonging' to landscapes, waterways, vegetation and animal communities. They expressed strong connection to highly significant places within the local and regional area. The PCWP identify both intangible and tangible for the local Ravensworth area. HNSW notes that the project's direct and indirect impacts will further contribute to the cumulative impacts and loss of Aboriginal cultural heritage values and sites in the local area and the region.

Following review of the provided material HNSW Recommends:

1. Glencore should continue to provide the RAPs with opportunities to be involved in management and mitigation measures associated with Aboriginal cultural values and impacts to Aboriginal cultural heritage.
2. In order to reduce disturbance to archaeologically sensitive areas and to avoid impact to significant Aboriginal sites a no impact buffer area of a minimum of 200 metres should be made either side of Bowmans Creek.
3. All Aboriginal objects within the project area, but outside of the disturbance footprint, should be conserved.

4. Salvage of Aboriginal objects within the disturbance footprint and additional archaeological excavation should be undertaken in consultation with the RAPs as recommended in the ACHM 2020 report.
5. The *Mt Owen Open Cut, Aboriginal Cultural Heritage Management Plan, V4* (XMO SD PLN 0060), 29 May 2018 should be updated to include all Aboriginal sites, cultural values and proposed management actions.
6. HNSW is satisfied that the significance assessment of the Aboriginal cultural heritage values of the project area have been adequately assessed, as well as management measures to mitigate any potential impacts on those values.
7. HNSW is satisfied that the significance assessment of the archaeological or scientific values of the project area have been adequately assessed and are consistent with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2010) as well as any potential impacts on those values.
8. HNSW is satisfied that consultation with the Aboriginal community has been undertaken in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010*. HNSW notes that GCOP have provided multiple opportunities for RAP involvement on all aspects of the project and consultation regarding their Aboriginal cultural values for the project area. A search of the Native Title Register on the 30 October 2020 confirmed that Native Title has not been awarded over the proposed GCOP SSD-9349 project area.