



Our ref: DOC20/894824-5

Philip Nevill  
Senior Environmental Assessment Officer  
Resources Assessments 1B  
Department of Planning Industry and Environment  
By email: philip.nevill@planning.nsw.gov.au

Dear Philip

### **Notice of Exhibition of application for Narrabri Underground Mine Stage 3 (SSD 10269)**

Thank you for the opportunity for Heritage NSW to review and comment on the above State Significant Development (SSD) proposal.

Heritage NSW have reviewed and considered the Aboriginal cultural heritage (ACH) assessment for the project prepared by Whincop Archaeology Pty Ltd on behalf of the proponent, Narrabri Coal Operations Pty Limited (October 2020).

### **Project proposal will cause minimal harm to Aboriginal cultural heritage**

HNSW accept the ACH assessment findings and recognize that the proposal to extend the existing underground mine (Stage 3) will have a minimal impact to Aboriginal cultural heritage which, comprise mostly of stone artefacts and isolated finds distributed across the project area at 60 locations. HNSW acknowledge that some objects may be harmed from infrastructure development but recognise that the proposed mitigation to reduce harm is adequate. HNSW has considered the reported low significance of the objects based on the commonality of the objects (isolated finds and scattered stone artefacts) and the impacts from a history of land use disturbance.

The subsidence assessment findings of low potential impacts to objects (stone artefacts and 1 axe grinding groove site) is noted (Whincop 2020:106-110 and 115-116). HNSW understand that the potential of possible impact to 1 axe grinding groove site (Mayfield GG1) is based on whether the grooves are on bedrock or a floating boulder. HNSW support that further investigation of Mayfield GG1 will be undertaken in consultation with the RAPs during Cultural Heritage Management Plan (CHMP) phase of the project.

### **ACH assessment is adequate**

Heritage NSW is satisfied that the ACH assessment has been adequately undertaken and fulfils the proscribed requirements set down in the Secretary's Environmental Assessment Requirements (SEARs). HNSW accept that additional areas within the project boundary may require further investigation post project approval.

The assessment has demonstrated a reliable projection of areas likely to have evidence of Aboriginal land use based on a landform site distribution model. HNSW expect that this model should be able to provide adequate guidance for further investigations.

### **Aboriginal consultation is adequate**

HNSW consider that the Aboriginal consultation has adequately addressed the requirements set down in the project SEARs (Whincop 2020:13-17, Appendix 1). HNSW note the request from several RAPs on test and salvage excavations and the proponent's responses (pp. 16-17). Details of test excavation and salvage programs can be further discussed and considered with the RAPs during the consultation process when developing the revised Cultural Heritage Management Plan (post project approval).

### **Cultural values and biodiversity**

The Environmental Impact Statement (EIS) identifies that the RAPs describe the ACH cultural values of the project area to be inclusive of general environmental attributes (Whincop 2020:118). HNSW encourage the proponent to consider ways for the RAPs to play a role in biodiversity management activities or activities associated with rehabilitation of ground disturbance areas, post project approval.

HNSW note that no responses from the RAPs were received regarding the values of recorded Aboriginal sites.

### **Revised Narrabri Aboriginal Cultural Heritage Management Plan**

HNSW support a revision of the existing ACHMP post approval to guide ACH management of sites within the project area and support the proposed management recommendations for protecting and minimising harm to Aboriginal objects (sections 12 and 13 of EIS).

If you have any questions regarding the above advice, please contact Phil Purcell, Archaeologist at Heritage NSW on 68835341 or [phil.purcell@environment.nsw.gov.au](mailto:phil.purcell@environment.nsw.gov.au).

Yours sincerely



### **DR SAMANTHA HIGGS**

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