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File: 11/21677
Job ID No: A1259607
Your Ref: SSI_5039



Dear Ms Mitchell

**RE: Exhibition of Environmental Impact Statement for
Chaffey Dam Augmentation and Safety Upgrade (SSI_5039)**

Reference is made to your letter, dated 11 December 2012, advising that the State Water Environmental Impact Statement (EIS) is currently on public exhibition for the abovementioned project.

In providing comment, I draw your attention to our previous responses and comments on the draft EIS, dated 1 and 21 November 2012.

Section 8.5 and Appendix 10 deal with European Cultural Heritage and the impact of the project on these values.

In the 'Preliminary Archaeological and Heritage Assessment, undertaken by Navin Officer Heritage Consultants in 2008, 12 recorded European sites were noted and a further 14 previously unrecorded sites identified.

Although this is the case, the EIS only assesses the impact of the project on the five sites listed on Tamworth Regional Council's Local Environmental Plan (these include Bowling Alley Point Cemetery, Bowling Alley Point School, Iron Footbridge, Uniting Church and the Bowling Alley Point Geological Site) as well as the project's impact on Chaffey Dam itself (proposed for inclusion on the State Water section 170 Register).

Although assessment of unlisted heritage sites is not specified in the DGRs, the purpose of an EIS is to assess impacts on all heritage items, not just those contained on existing statutory registers.

In the EIS, Navin Officer Heritage Consultants has made recommendations for five of the unlisted heritage sites. However, the failure to assess the impact of the project (and provide suitable mitigation recommendations) on each of the known heritage sites, listed or not, is a weakness of the EIS.



The EIS also states that, due to the absence of archaeological sites on Tamworth Council's LEP within the project site, no archaeological assessment methodology was prepared. Considering the number of heritage sites identified (included on statutory lists or not), this statement is considered inadequate and a full archaeological study of non-Aboriginal sites and the development of the appropriate methodology is recommended.

Although appropriate archaeological methodology is not deemed to be necessary by the EIS, the document states that if a "previously unidentified potential heritage object is uncovered during construction, measures will be implemented to avoid disturbance to the item, until an appropriate management strategy is implemented" (p197). Again, it is recommended that an archaeological assessment be undertaken to identify what may be uncovered during the project and outline the appropriate methodology to use if and when these finds are made.

The Heritage Branch would be happy to review any further documentation that may address any likely heritage impacts. If you have any further enquiries regarding this matter, please contact Lucy Moore, Heritage Officer, on (02) 9873 8535.

Yours sincerely



19/12/2012

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As Delegate of the NSW Heritage Council