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By email: [Rose-Anne.Hawkeswood@planning.nsw.gov.au](mailto:Rose-Anne.Hawkeswood@planning.nsw.gov.au)

Dear Ms Hawkeswood

### **Expansion of Vickery Coal Mine – Environmental Impact Statement Exhibition (SSD 7480)**

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Reference is made to your email dated 11 September 2018 inviting comment on the above Environmental Impact Statement (EIS) by Whitehaven Coal proposal for the expansion of the approved Vickery Coal Mine. It is understood that the approved open cut coal mine is yet to be constructed and is in the Gunnedah Coalfield, approximately 25km north of Gunnedah within the Gunnedah and Narrabri local government areas. The site is predominantly cleared for pastoral uses and contains rural structures. Historic mining activity has also been conducted in some areas.

The Historic Heritage Assessment (Appendix K) prepared by Extent dated 6 August 2018 (Extent report) has been reviewed and it is noted that the site and its vicinity do not contain any heritage items listed on the State Heritage Register. The Extent report does identify and assess local heritage items that may be directly and indirectly affected by the proposal. Comments on impacts to local heritage items are deferred to the local council as the managers of items of local heritage significance.

Specially, the Extent report identifies the Kurrumbede Homestead Complex (c.1907) owned by Whitehaven Coal at 1693 Blue Vale Road, Gunnedah, as having local significance and potential state significance, particularly for its associations with the Australian poet Dorothea MacKellar.

The Extent report identifies the proposal to have no direct impact upon the physical fabric of the Kurrumbede Homestead Complex but could have potential indirect impacts such as:

- Ground vibration from blasting which could impact the structures at Kurrumbede.
- Changes to the rural setting with new mine infrastructure and mining landforms visible to and from the Kurrumbede Homestead Complex.
- Use of the main residence as office space rather than a residence, during the 25-year life of the project.

Several recommendations to mitigate the above impacts are outlined in the Section 7.4 of the Extent report. These include:

- Inspection of the main residence by a structural engineer to guide blast design.
- Monitoring during blasts to guide and revise blast design.
- Rehabilitation of waste rock emplacements and revegetation to merge with the surrounding landscape to minimise visual impacts.

- Maintenance of historic landscaping and screen planting around the Kurrumbede residence. Enhancement of screen planting.
- Monitoring of the physical condition of the Kurrumbede Homestead Complex in light of changes to dust and vibration.
- Make safe and weatherproof the residence and outbuildings to prevent deterioration.
- Ensure the Kurrumbede Homestead Complex is used during the construction and operation of the project, potentially for cultural events.
- End-of-mine remediation measures and revegetation.

Section 7.4 of the Extent report also states that Whitehaven Coal has committed to the preparation of a Heritage Management Plan for the Kurrumbede Homestead Complex prior to the commencement of construction of the project. The preparation of a Heritage Management Plan and the mitigation measures in this section are supported.

Should the application be approved by DPE, it is recommended that conditions of approval require:

- Implementation of the mitigation measures outlined in Section 7.4 of the Extent report; and
- The preparation and implementation of a Heritage Management Plan in accordance with the recommendations outlined in Section 7.4 of the Extent report. In addition, the Heritage Management Plan should include a cyclical maintenance plan for both built and landscape elements.

It is noted that an Aboriginal Cultural Heritage Assessment has been undertaken. Separate comments on Aboriginal archaeological and cultural values of the project will be provided by the Regional Operations Division, Northern Region of the Office of Environment and Heritage.

If you have any questions, please contact Lily Chu, Senior Heritage Assessment Officer at the Heritage Division, Office of Environment and Heritage on 02 9873 8595 or [lily.chu@environment.nsw.gov.au](mailto:lily.chu@environment.nsw.gov.au).

Yours sincerely



18/10/2018

**Katrina Stankowski**

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**As Delegate of the Heritage Council of NSW**