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1. Singleton Council high level review of the Heritage Assessment documentation in relation to Ravensworth Estate and the Ravensworth Homestead Complex, Glendell Mine, Glencore.

The main objectives of this high level review are as follows;

- To verify the information presented;
- Identify the direction of the presented documentation; and,
- Interpret what the preferred option for relocation is.

2. SEARS

The SEARs were issued by the Department of Planning & Environment in June 2018 and included the following key heritage issues that are to be included within the EIS for the application:

- “an assessment of the potential impacts of the development on Aboriginal heritage (cultural and archaeological), including consultation with relevant Aboriginal communities/parties and documentation of the views of these stakeholders regarding the likely impact of the development on their cultural heritage;
- identification of historic heritage in the vicinity of the development and an assessment of the likelihood and significance of impacts on heritage items, having regard to the relevant policies and guidelines [listed in Attachment 1 to the SEARs]; and in relation to Ravensworth Homestead, the EIS must include:
- a detailed heritage significance and historical archaeological assessment of the homestead, including consideration of its surrounding garden and landscape;
- an analysis of all reasonable and feasible options to preserve the Homestead (including leaving in situ);
- if relocation is selected as the preferred option, please include an analysis of all feasible relocation options and how the Ravensworth Homestead Advisory Committee was involved in the decision.

This review does not consider Aboriginal heritage adequacy nor make any comment on it. This document is wholly concerned with the relocation of Ravensworth Homestead and the various reporting completed to date to support such a move.

Dot point 2 through 5 provide the direction for the study and the expected deliverables by the Department. Council also needs to recognise these directives when making comment in regard to the project.

Identification of historic heritage in the vicinity of the development and an assessment of the likelihood and significance of impacts on heritage items

Several reports, comprehensive in the scale and the information provided have been completed. Appendices 23a, 23b and 23c are the key documents that establish significance and impacts both historical and archaeological. 23a provides a detailed analysis of the documentary and physical evidence of the (former) Ravensworth Estate and Ravensworth Homestead Complex including an assessment of the significance of all its elements. 23b provides Complex Measured Drawings with 23c detailing the Historic Archaeological Test Excavation Report and Impact Statement for the Core Estate Lands plus the outcomes of the historical archaeological test excavation program conducted within and around the Ravensworth Homestead Complex. It should be noted that all archaeological resources in and around the homestead will be lost to open cut mining if the project meets with approval.

Comment

Interestingly the heritage study area definition relates to both the “place” and also “core estate lands”. The report defines the place as; being all the land located within the historic boundaries of the three land grants forming the core of the Ravensworth Estate, that is Portions 149 and 150 of the Parish of Liddell and Portion 1 of the

Parish of Vane. Together this land comprises Dr. James Bowman's original "10,000" (10,439) acre land grants applied for under Governor Brisbane in 1824 (refer to Section 2 for further details).

The Core Estate Lands are described as; the allotment containing the Ravensworth Homestead Complex together with the land to the west between Yorks Creek and Bowmans Creek.

Further refinement is then achieved by establishing the Ravensworth Homestead Complex; described as being constructed in c1832, the complex consists of a symmetrical group of agricultural buildings with homestead and attached kitchen, located in a garden setting.... The complex is clearly delineated from its immediate setting and the broader Core Estate Lands by being contained within agricultural fencing.

Several maps are provided to help identify these localities.

This structure is worthwhile in order to easily identify separate heritage precincts for discussion and future management decisions. Figure 3.1 and 3.2 on page 125 of the Ravensworth Estate, Singleton, NSW Heritage Analysis and Statement of Significance (Final: November 2019) shows the heritage items in the differing precincts (of note is that it lists the Ravensworth School – item 23A).

Section 4 (page 276) of the above-mentioned report provides the analysis of evidence and acknowledges two locally listed heritage items on the Singleton LEP for consideration. These are;

- Item No. 141 Ravensworth Homestead, 463 Hebden Road, Ravensworth
- Item No. 142 Former Public School, Hebden Road, Ravensworth

Section 5 is comprehensive and offers the Statement of Significance for all the various heritage items captured by the proposal. Two schools in the "place" (10,000 acres), the Ravensworth Public School and the Hebden Public School are listed as retaining moderate social value.

Generally the findings of the Ravensworth Estate, Singleton, NSW Heritage Analysis and Statement of Significance (Final: November 2019) is well researched, informative and provides detailed assessment. The section perhaps of most interest to Council for now is section 5.6.12. Grading of the Historical Archaeology of the Core Estate Lands which contains a table listing the significance of all the various items and their contribution to the place.

Appendix 23b, the measured drawings and Appendix 23c Archaeological Investigation reporting are of high quality and accurate in their findings. They act as support documents for Appendix 23a. Together these documents meet the SEARS requirements for dot points 2 and 3 as presented earlier in this document (page 1).

3. Glendell Mine Extension, Ravensworth, NSW Statement of Heritage Impact

Appendix 23d is critical to council understanding and should be reviewed in full at a later date. It assesses the impact of the proposed project on the heritage values of the former Ravensworth Estate lands and Ravensworth Homestead Complex, as well as the heritage values of the two proposed relocation option sites.

The key items are;

The proposed Glendell Mine extension involves land on which the Ravensworth Homestead Complex (RHC) is located, the proposal also includes the relocation of the RHC group of buildings to one of two recipient site options and the adaptive reuse of the buildings. The two relocation options are as follows:

- Ravensworth Farm Recipient Site: relocate the Ravensworth Homestead Complex in full-building sections to the nearby site at Ravensworth Farm (Intact Move) and install it there and adapt for office use and staff training.
- Broke Recipient Site, conceptually proposed as McNamara Park: this is a proposal that was initiated by members of the Broke-Fordwich community and involves dismantling the Ravensworth Homestead Complex

and rebuilding the buildings on the public reserve site at the town of Broke, NSW (Dismantle and Rebuild Move) and adapting for gallery, market and *tourist uses*. *It is acknowledged that this option would be subject to separate approvals.*

The above underlined and italicized sentence is important to Council as it would likely be the authority to consider the application.

The document sets out the reason for relocation as;

Given the location of the proposed Glendell Pit Extension, it is not possible to retain the Homestead in its current location. Therefore, the proposal to relocate the RHC is the “sole practical means of ensuring its survival.” The justification for this is included in a separate EIS document (Appendix 23e: Relocation Justification Statement). The justification is mainly the overwhelming economic value of the proposed mine and associated employment opportunities that would be produced, whilst also providing, in the case of the Ravensworth Farm option, a relocation option that provides substantial retention of heritage values.

Comment

In simple heritage terms it is far better for the homestead to be retained within the boundary of the former Bowman Estate (the place 10,000 acres) where it can retain connectivity to its integral elements, rather than be moved to a location which is alien and has no heritage connectivity or integrity.

Of the two relocation options, the Ravensworth Farm option approval would be under the SSD consent and would require no further approvals. This provides a sure path with a guaranteed outcome. The Broke option requires land tenure to be secured for the proposed location and all requisite statutory approvals (Secondary Approvals) would be required to be obtained. There is no guarantee this could be achieved and adds the uncertainty of an unspecified time frame into the mix, during which time the RHC continues to deteriorate and weather. Of further note in this document is the comment that if the Broke approvals cannot be obtained in a timely manner (suggested by the applicant as within two years of the commencement of the SSD development consent), then the applicant will relocate the Homestead to the Ravensworth Farm site. Hence, the Broke option is merely that, an option that cannot be achieved and therefore the only reasonable option available is for the Ravensworth Farm to accommodate the relocated structures and under adaptive reuse modify for Glendell Operations use. This also means that the RHC buildings will be utilized, maintained and managed providing certainty into the future for the homestead and associated items.

Hence dot points 4 and 5 are satisfied by Appendix 23d, with economic justification provided in Appendix 23e and route selection covered in 23f. The two options are fully fleshed out in 23g (Ravensworth Farm) and 23h (Broke).

Observation

It appears odd that Appendix 23i considers future remediation and management of Hebden Public School, yet no comment or documentation is provided for Ravensworth Public School. Why is it that one school can be included in the EIS documentation and the other cannot?

4. Conclusion

The stated objectives of this document have been satisfied in this review. These were;

- To verify the information presented;
- Identify the direction of the presented documentation; and,
- Interpret what the preferred option for relocation is.

The information presented is of high quality, extensive and detailed as it should be. The evaluation documentation offers no opinion on the options presented, simply issuing the various details and facts surrounding the intention to relocate the RHC. Of this there is no confusion, the proponent will move the RHC and the issued documentation creates the ability to achieve this outcome. The only item left to consider is the relocation site of which two are proposed yet reading deeply into the documentation it would seem Glendell's preference is to relocate RHC to

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Ravensworth Farm for adaptive reuse as an administrative centre. This is the best outcome in heritage terms and Singleton Council's position may be supportive of this objective.

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