



Our ref: DOC19/10190978

Ms Lauren Evans
Energy and Resource Assessment
Planning and Assessment
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By email: lauren.evans@planning.nsw.gov.au

Dear Ms Evans

Notice of Exhibition of application for (Glendell Continued Operations Project) (SSD 9349)

Thank you for your referral dated 4 December 2019 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) proposal. The proposed development involves:

- Continuation of mining of existing approved reserves in the Glendell Pit
- Mining of the Glendell Pit Extension by open cut operations recovering approximately 135 Mt ROM coal down to and including the Hebden seam
- The continuation of haulage of coal to the Mount Owen ROM coal pads for processing at the Mount Owen CHPP
- Relocation of the Ravensworth Homestead
- The demolition and removal of the existing Glendell Mine Infrastructure Area (MIA), and construction of the new Glendell MIA and Heavy Vehicle Access Road
- The realignment of part of Yorks Creek and a section of Hebden Road and other infrastructure
- The rehabilitation of areas directly affected by the mining and emplacement of overburden from mining at Glendell, the MIA, Heavy Vehicle Access Road and disturbed areas associated with ancillary works.

There are no State Heritage Register (SHR) items, under the Heritage Act 1977, present within the proposed project area. However, there is a local heritage item, Ravensworth Homestead, listed as item I41 on the Singleton Local Environmental Plan (SLEP) 2013).

Ravensworth Homestead was one of 19 places identified as a very early Homestead in a Heritage Council comparative study of Homestead Estates in the Hunter Valley (2013) and the Heritage Council has recommended it for nomination on the State Heritage Register (SHR). The advice provided below is on the basis that this place and its cultural landscape (immediate and wider) is of State significance.

The Secretary's Environmental Assessment requirements (SEARs) relating to Heritage for the project require the EIS to undertake:

1. *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;*

2. *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; and*
3. *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); and*
 - *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;*

The contents of the 'Environmental Impact Assessment', Umwelt, November 2019 and specifically, its appendices were consulted to provide comments:

- Appendix 1 'Mine Planning Options Report', Glencore Coal Assets Australia, 25 November 2019.
- Appendix 23a 'Heritage Analysis and Statement of Significance', Lucas Stapleton Johnson, November 2019;
- Appendix 23c 'Historic Archaeological Test Excavation Report and Impact Statement for the Core Estate Lands' by Casey & Lowe, November 2019;
- Appendix 23d 'Statement of Heritage Impact' by Lucas Stapleton Johnson, 25 October 2019;
- Appendix 23e 'Heritage Ravensworth Relocation Justification Report' by Glencore Coal Assets Australia, 25 November 2019;
- Appendix 23f 'Heritage Ravensworth Homestead Relocation Option Identification and Assessment'; by Glencore Coal Assets Australia, 28 November 2019;
- Appendix 23g – 'Heritage Ravensworth Farm Proposal', multiple authors;
- Appendix 23h – 'Heritage Broke Village Option', multiple authors; and
- Appendix 25 – 'Visual Assessment' by Umwelt, 25 November 2019.

Heritage Council general comments:

1. The Heritage Council endorsed the ICOMOS report, 'The Future of Our Pasts: Engaging cultural heritage in climate action' in 2019 and is committed to ensuring long term protection and conservation of our cultural heritage through the good practice, adaption and mitigation advice it provides and the actions it recommends.
2. The Heritage Council considers that Ravensworth Homestead and its surrounding cultural landscape is likely to be of state heritage significance for its aesthetic, historic, scientific and social values.
3. The proposed relocation of Ravensworth Homestead will result in the irreversible loss of its identified high and exceptional significance in the form of its intact fabric, setting, views and meaning. The cultural landscape which reinforces the Complex's state significance including in-situ archaeology, Aboriginal intangible cultural values and cultural landscape plantings will be lost. The proposed relocation options also have potential to result in loss and major damage to the significant fabric of Ravensworth Homestead.
4. The Heritage Council does not support the relocation of Ravensworth Homestead as either option would result in an unacceptable heritage impact. The Heritage Council considers that

relocating the homestead may remove its State significant values and the relocated buildings are unlikely to meet the criteria for state heritage significance.

5. The Heritage Council strongly supports Ravensworth Homestead being retained in its current, highly significant location with a curtilage around its equally significant cultural landscape.

Heritage Council specific comments on EIS report:

1. The EIS has adequately addressed the following SEARs for the Project:
 - a) *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;*
 - This part of the SEAR has been adequately addressed in the EIS.
 - b) *in relation to Ravensworth Homestead, the EIS must include: a detailed historical archaeological assessment of the homestead, including consideration of its surrounding garden and landscape.*
 - This part of the SEARs has been adequately addressed in the EIS. Enough historical archaeological testing was completed to establish that the Ravensworth Homestead and property retains a historical archaeological resource of State significance. If the Homestead is retained as part of an amended Glendell proposal, then the archaeology would also be retained *in-situ* and undisturbed. It is considered that this part of the SEAR relating to historical archaeology has been met.
 - If the extension of the Glendell Pit is approved in its current form, then full archaeological salvage would be required as a mitigation measure as recommended by Casey & Lowe in their November 209 report.
 - c) *...how the Ravensworth Homestead Advisory Committee was involved in the decision [for relocation of Ravensworth Homestead].*
 - This part of the SEAR has been adequately addressed in the EIS.
2. The EIS has not adequately addressed the following SEARs for the Project. It is requested that the EIS is updated with further information based on the following dot points:
 - d) *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;*
 - The EIS has identified that the site has a very significant pre and post contact Aboriginal history. This history will be included in the SHR nomination assessment.
 - The Heritage Council notes that the EIS outlines that Aboriginal significance of the site is assessed as low-moderate based on an assessment of the scientific significance of the Aboriginal archaeology present within the Homestead area and wider estate lands. However, an interrogation of the relationship between the Homestead and Aboriginal people has not been fully investigated. The EIS focuses on specific events and their locations rather than undertaking an assessment of the wider Aboriginal cultural heritage significance related to the sites social and intangible

values as the place of contact between and the reason for conflict among Aboriginal groups and European early settlers.

- The impacts on these potentially significant values from the proposal have not been assessed.
- The Heritage Council requests that the EIS should be amended to include this information. The Heritage Council considers that when the intangible values related to the role Ravensworth Homestead and its wider cultural landscape played in frontier conflicts are re-examined, the level of significance for the Aboriginal values of the site would be likely to increase. The impact the proposal would have on those values may then be weighted more heavily.

- e) *in relation to Ravensworth Homestead, the EIS must include:
a detailed heritage significance assessment of the homestead, including consideration of its surrounding garden and landscape.*

The assessment of the heritage significance of the homestead including its surrounding garden and landscape and subsequent Statement of Significance in the EIS is considered inadequate for the following reasons:

- The description of Ravensworth's connection to 'range of significant places and people' is considered inadequate. These places and people should be identified.
- The acknowledged connection of John Verge, one of Australia's pre-eminent colonial architects, with the design of the Ravensworth Homestead and Stables, referred to in both this report (HHAA, p59) and in previous studies by the authors, has not been sufficiently considered. The analysis should include a precautionary approach including a comparison of Ravensworth with other examples of work by Verge. Furthermore, the link to Verge and the MacArthur's should be referenced in the Statement of Significance.
- The EIS has a lack of definition of the curtilage or setting of Ravensworth Homestead and lacks an assessment of the cumulative impact of the works on the significance of the Core Estate Lands.
- The comparative analysis with pre 1850s Hunter homesteads is inadequate to enable an assessment of the significance of Ravensworth as the following have not been considered:
 - o The main house on the Ravensworth property (called Ravensworth) has been identified as one of very few homesteads from the initial establishment period to survive relatively unchanged in terms of its vernacular form (CHS, p57).
 - o There are 4 properties identified in the 2013 comparative study which also include a House and Primary Farmyard with five or more buildings with a single nucleus, including Bolwarra (modified by later additions), Negoa, Kinross and Abbey Green. Existing SHR items with similar features include Tocal Homestead (SHR00147) and Dunmore House (SHR01887). Direct comparisons between Ravensworth and these properties have not been made.
 - o The use of architects in the design and construction of the early homesteads is rare. It appears that Ravensworth is a rare example of this.
 - o The known archaeology and written records existing for Ravensworth relating to its Aboriginal history is an uncommon and highly significant aspect of the place, particularly regarding its history as a place associated with frontier conflict between European and Aboriginal people.

- Although incidents of violent conflict between European and Aboriginal peoples are likely to have been more common, only approximately 16 of these incidents in the 1820s are well documented. Six of these incidents are associated with the Ravensworth property, including one incident popularly referred to as the Ravensworth Massacre. Other incidents are noted to have occurred in the vicinities of Gostwyck, Invermein and Segenhoe, and existing SHR item, Merton (SHR00159). The site with the most available documentation, and therefore the closest comparative example in this sense, is Gostwick. Direct comparisons with these properties have not been made.
 - The post contact history of interaction with Aboriginal people is also seen in documentation of places of Aboriginal employment such as Merton (SHR00159) and Caergwrie, camp sites such as Invermein, Bolwarra and Glendon, corroborree and/or ceremonial sites such as Segenhoe and Bolwarra, and sites selected with the help of Aboriginal guides such as Bolwarra, Glendon and Segenhoe. Direct comparisons between Ravensworth and these properties have not been made.
- The Casey & Lowe report completed quite extensive assessment against the NSW Heritage Criteria, which is missing from the Statement of significance and should be included as the site is likely to provide unique insights into:
 - A newly-established frontier and contact/ interaction with Aboriginal people.
 - Rural lifeways, including tastes and customs through the 19th to early 20th centuries.
 - Material culture and lives of significant colonial people.
 - Convict lives and the assignment system and how it was implemented within this landscape.
 - Use of technology and management of water, changing transportation and economics and how they shaped life on the estate.
- f) *an analysis of all reasonable and feasible options to preserve the Homestead (including leaving in situ);*
 - The EIS has not adequately met the requirements of this SEAR as it has not provided an analysis of all reasonable and feasible options to preserve the Homestead (including leaving in situ) or an adequate justification of why Options 6, 7 and 8 are not possible to ensure that Ravensworth Homestead is not impacted by the proposed works.
- g) *if relocation is selected as the preferred option, please include an analysis of all feasible relocation options...*
 - This SEAR has not been met. The proposed options for relocation are not considered to have been appropriately met as neither option provides for the full relocation of the entirety of Ravensworth Homestead without demolition or removal of significant fabric such as the 1920s addition and the original homestead footings. Much more detailed information needs to be provided before either option can be considered.
 - There are several significant issues raised regarding the 'intact' relocation Option 1, including the unique project risks outlined by the movers, as well as the outstanding methodology and cost calculations that provide little certainty to this option.
 - Furthermore, the preferred intact relocation option will require a large amount of demolition of significant fabric which will not be relocated to the new location and the introduction of new fabric such as new footings. The current condition of Ravensworth

House and its original construction techniques also mean the buildings are not favorable to relocation.

- Insufficient information has been provided for Option 1 regarding the presence of underground mining under the recipient site and the likely blasting vibrations impacts on the relocated structures from existing adjacent mines.
- Similar issues exist for Option 2. The proposed removal of internal walls will remove original fabric, graded high significance and alter the internal layout, graded exceptional significance. The current Option 2 proposed approach to the conservation of Ravensworth Homestead including the similar approach to the outbuildings will have a severely detrimental impact to their heritage significance

The Heritage Council considers that the EIS needs much more detailed information regarding the issues raised in the above letter under point 2 (d-g).

If you have any questions regarding this advice on the EIS for the Glendell Continued Operations Project, please contact me on (02) 9873 8569 or katrina.stankowski@environment.nsw.gov.au.

Yours sincerely



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Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
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