



File: SF21/20397
Our ref: DOC21/554462

Ms Tegan Cole
Department of Planning, Industry and Environment
Locked Bag 5022,
Parramatta NSW 2124.

By email: Tegan.Cole@planning.nsw.gov.au.

Dear Ms Cole,

Response to Submission comments for Mt Pleasant Optimisation Project (SSD 10418)

Thank you for your referral dated 5 July 2021 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) Response to Submissions.

The following comments are provided to address the applicant's response to the heritage issues raised:

- The application is supported by an Historical Heritage Assessment and Statement of Heritage Impact prepared by Extent Heritage 2020 (HHA and SOHI) to support the proposed change (the Mount Pleasant Optimisation project).
- Extent assessed impacts to 29 previously identified heritage items in the 2020 report. Of this figure, the Optimisation project has substantial new works proposed and will impact 8 heritage items within the project area (Extent 2020). Seven of the 29 items are no longer assessed as being heritage items, 7 items will not be impacted by the Optimisation project and a further 7 are outside the mining lease boundary. These items will not be impacted by the project.
- Heritage NSW (HNSW) notes that the response maintains it is not necessary for the project to undertake additional historical research, in particular to support assessment of heritage significance or to supplement the VAHS (2014) report. Undertaking appropriate levels of research reflects Heritage Council policy and best practice. HNSW reiterates that understanding significance, which is key to informing heritage management at a site, is underpinned by the level of research carried out. The Optimisation project has been subject to multiple consents over a long period. It is of interest why reassessment of the heritage items at the site has been undertaken, if not for any change in outcome.
- HNSW considers that the archaeology within the site has been overall appropriately addressed. However, in terms of archaeological impact management, the response states that any Archaeological Research Design and Excavation Methodology (ARDEM) requirements— such as for the management of relics subject to impact— could be addressed through preparation of an Historic Heritage Management Plan (HHMP).
- HNSW reaffirms support for the preparation of CMPs, particularly for sites with state significance item(s). The *Heritage Act 1977* applies outside of the SSD boundary, including management of relics under s139 of the Act.

On behalf of the Heritage Council of NSW, it is recommended that the following conditions are included if the SSD application is approved:

Management of impact to potential relics:

1. Prior to any archaeological investigations occurring on site, the Applicant shall engage a suitably qualified historical archaeologist to prepare an Archaeological Research Design and Excavation Methodology (ARDEM), in accordance with the Guidelines published by the Heritage Council of NSW, to manage disturbance to historical archaeological relics on site, including those sites identified in the Extent Heritage report. The ARDEM should assess their significance and consider the impacts from the proposal on this potential resource.

Reason: The subject site has potential to contain historical archaeological relics. Assessing archaeological potential and significance in relation to development impact is key to formulating an appropriate archaeological mitigation strategy.

Unexpected Finds:

2. The Applicant must ensure that if any unexpected archaeological deposits or relics not identified and considered in the supporting documents for this approval are discovered, work must cease in the affected area(s) and the Heritage Council of NSW must be notified as required by s146 of the *Heritage Act 1977*. Additional assessment and approval may be required prior to works continuing in the affected area(s) based on the nature of the discovery.

Reason: Notification is required under s146 of the Heritage Act 1977. This requirement is not suspended by an SSD approval.

If you have any questions regarding the above advice, please contact Felicity Barry, Senior Historical Archaeologist at Heritage NSW, on (02) 9995 6914 or Felicity.Barry@environment.nsw.gov.au.

Yours sincerely

S Lavelle

16 July 2021

Dr Siobhan Lavelle, OAM
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Heritage NSW
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW